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May 8, 2014

**VIA ELECTRONIC FILING AND
OVERNIGHT DELIVERY**

Jocelyn G. Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29211

RE: Duke Energy Progress, Inc. Annual Review of Base Rates for Fuel Costs
Docket No. 2014-1-E

Dear Mrs. Boyd:

Enclosed for filing on behalf of Duke Energy Progress, Inc. ("DEP"), please find the following pre-filed Direct Testimony:

1. Kenneth D. Church
2. T. Preston Gillespie, Jr.
3. Sasha J. Weintraub
4. Kimberly D. McGee, and
5. Joseph A. Miller, Jr.

Mr. Gillespie's confidential exhibit 3 is being sent via overnight delivery to your office for filing under seal. The exhibit contains confidential, proprietary, and sensitive outage information that if disclosed, could negatively impact DEP's ability to safely and reliably provide effective service to its customers. Pursuant to Order No. 2005-226, DEP requests that Mr. Gillespie's confidential testimony exhibit 3 be treated and maintained as confidential. We respectfully request that the Commission grant the request for confidential treatment pursuant to 26 S.C. Regs. 103-804(S)(2) and under the Freedom of Information Act, S.C. Code Ann. § 30-4-10 *et seq.* Mr. Gillespie's testimony, with confidential exhibit 3, is being provided to the Office of Regulatory Staff and those parties who signed a confidentiality agreement in the above referenced proceeding.

Jocelyn G. Boyd
May 8, 2014
Page 2

If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, reading "Timika Shafeek-Horton". The signature is written in a cursive, flowing style.

Timika Shafeek-Horton
Deputy General Counsel

TSH/bml

Enclosures

cc: Brian L. Franklin, Esq.
Jeffrey M. Nelson, Esq., ORS (w/ enclosures)
Robert R. Smith, II, Esq. (w/ enclosures)
Michael K. Lavanga, Esq. (w/ enclosures)
Garret A. Stone, Esq. (w/ enclosures)

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2014-1-E

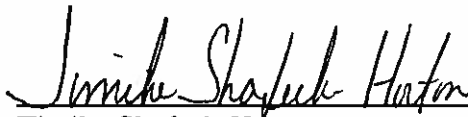
This is to certify that a copy of Duke Energy Progress, Inc.'s pre-filed **Direct Testimony of T. Preston Gillespie, Jr., Kenneth D. Church, Sasha J. Weintraub, Kimberly D. McGee, and Joseph A. Miller, Jr.** in the foregoing docket, has been served by electronic mail or by depositing a copy in the United States Mail, first class postage prepaid, properly addressed to:

Jeffrey M. Nelson, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Robert R. Smith, II, Esq.
Moore & Van Allen, PLLC
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8th Floor, West Tower
1025 Thomas Jefferson Street, NW
Washington, DC 20007

This the 8th day of May, 2014.



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Charlotte, North Carolina 28201-1006
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**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-1-E**

In the Matter of)	
Annual Review of Base Rates)	DIRECT TESTIMONY OF
For Fuel Costs for)	KENNETH D. CHURCH FOR
Duke Energy Progress, Inc.)	DUKE ENERGY PROGRESS, INC.
)	

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Kenneth D. Church and my business address is 526 South Church
3 Street, Charlotte, North Carolina.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am the Manager of Nuclear Fuel Engineering's Fuel Management & Design for
6 Duke Energy Progress, Inc. ("DEP" or the "Company") and Duke Energy Carolinas,
7 LLC ("DEC").

8 **Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES AT DEP?**

9 A. I am responsible for nuclear fuel procurement and spent fuel management, as well as
10 the fuel mechanical and thermal hydraulic design and reload licensing analysis for
11 the nuclear units owned and operated by DEP and DEC.

12 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
13 **PROFESSIONAL EXPERIENCE.**

14 A. I graduated from North Carolina State University with a Bachelor of Science degree
15 in mechanical engineering. I began my career with DEC in 1991 as an engineer and
16 worked in various roles, including nuclear fuel assembly and control component
17 design, fuel performance, and fuel reload engineering. I assumed the commercial
18 responsibility for purchasing uranium, conversion services, enrichment services, and
19 fuel fabrication services at DEC in 2001. Beginning in 2011, I incrementally
20 assumed responsibility at DEC for spent nuclear fuel management along with the
21 nuclear fuel mechanical and thermal hydraulic design and reload licensing analysis
22 functions. Subsequently, I assumed the same responsibilities for DEP following the
23 merger between Duke Energy Corporation and Progress Energy, Inc.

1 I have served as Chairman of the Nuclear Energy Institute's Utility Fuel
2 Committee, an association aimed at improving the economics and reliability of
3 nuclear fuel supply and use, and I am currently a registered professional engineer in
4 the state of North Carolina.

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
6 **PROCEEDING?**

7 A. The purpose of my testimony is to (1) provide information regarding DEP's nuclear
8 fuel purchasing practices, (2) provide costs for the March 1, 2013 through February
9 28, 2014 review period ("review period"), and (3) describe changes forthcoming for
10 the July 1, 2014 through June 30, 2015 billing period ("billing period").

11 **Q. YOUR TESTIMONY INCLUDES TWO EXHIBITS. WERE THESE**
12 **EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER**
13 **YOUR SUPERVISION?**

14 A. Yes. These exhibits were prepared at my direction and under my supervision, and
15 consist of Church Exhibit 1, which is a Graphical Representation of the Nuclear Fuel
16 Cycle, and Church Exhibit 2, which sets forth the Company's Nuclear Fuel
17 Procurement Practices.

18 **Q. PLEASE DESCRIBE THE COMPONENTS THAT MAKE UP NUCLEAR**
19 **FUEL.**

20 A. In order to prepare uranium for use in a nuclear reactor, it must be processed from an
21 ore to a ceramic fuel pellet. This process is commonly broken into four distinct
22 industrial stages: (1) mining and milling, (2) conversion, (3) enrichment, and (4)
23 fabrication. This process is illustrated graphically in Church Exhibit 1.

1 Uranium is often mined by either surface (i.e., open cut) or underground
2 mining techniques, depending on the depth of the ore deposit. The ore is then sent to
3 a mill where it is crushed and ground-up before the uranium is extracted by leaching,
4 the process in which either a strong acid or alkaline solution is used to dissolve the
5 uranium. Once dried, the uranium oxide (“U₃O₈”) concentrate – often referred to as
6 yellowcake – is packed in drums for transport to a conversion facility. Alternatively,
7 uranium may be mined by in situ leach (“ISL”) in which oxygenated groundwater is
8 circulated through a very porous ore body to dissolve the uranium and bring it to the
9 surface. ISL may also use slightly acidic or alkaline solutions to keep the uranium in
10 solution. The uranium is then recovered from the solution in a mill to produce U₃O₈.

11 After milling, the U₃O₈ must be chemically converted into uranium
12 hexafluoride (“UF₆”). This intermediate stage is known as conversion and produces
13 the feedstock required in the isotopic separation process.

14 Naturally occurring uranium primarily consists of two isotopes, 0.7%
15 Uranium-235 (“U-235”) and 99.3% Uranium-238 (“U-238”). Most of this country’s
16 nuclear reactors (including those of the Company) require U-235 concentrations in
17 the 3-5% range to operate a complete cycle of 18 to 24 months between refueling
18 outages. The process of increasing the concentration of U-235 is known as
19 enrichment. Gas centrifuge is the primary technology used by the commercial
20 enrichment suppliers. This process first applies heat to the UF₆ to create a gas, then,
21 using the mass differences between the uranium isotopes, the natural uranium is
22 separated into two gas streams, one being enriched to the desired level of U-235,

1 known as low enriched uranium, and the other being depleted in U-235, known as
2 tails.

3 Once the UF₆ is enriched to the desired level, it is converted to uranium
4 dioxide ("UO₂") powder and formed into pellets. This process and subsequent steps
5 of inserting the fuel pellets into fuel rods and bundling the rods into fuel assemblies
6 for use in nuclear reactors is referred to as fabrication.

7 **Q. PLEASE PROVIDE A SUMMARY OF DEP'S NUCLEAR FUEL**
8 **PROCUREMENT PRACTICES.**

9 A. As set forth in Church Exhibit 2, DEP's nuclear fuel procurement practices involve
10 computing near and long-term consumption forecasts, establishing nuclear system
11 inventory levels, projecting required annual fuel purchases, requesting proposals
12 from qualified suppliers, negotiating a portfolio of long-term contracts from diverse
13 sources of supply, and monitoring deliveries against contract commitments.

14 For uranium concentrates, conversion, and enrichment services, long-term
15 contracts are used extensively in the industry to cover forward requirements and
16 ensure security of supply. Throughout the industry, the initial delivery under new
17 long-term contracts commonly occurs several years after contract execution. DEP
18 relies extensively on long-term contracts to cover the largest portion of its forward
19 requirements. By staggering long-term contracts over time for these components of
20 the nuclear fuel cycle, DEP's purchases within a given year consist of a blend of
21 contract prices negotiated at many different periods in the markets, which has the
22 effect of smoothing out DEP's exposure to price volatility. Diversifying fuel
23 suppliers reduces DEP's exposure to possible disruptions from any single source of

1 supply. Due to the technical complexities of changing fabrication services suppliers,
2 DEP generally sources these services to a single domestic supplier on a plant-by-
3 plant basis using multi-year contracts.

4 **Q. WHAT CHANGES HAVE OCCURRED IN THE UNIT COST OF THE**
5 **VARIOUS STAGES OF NUCLEAR FUEL DURING THE REVIEW**
6 **PERIOD?**

7 A. During the review period, the published long-term market price for uranium
8 concentrates was in the range of \$50.00/lb to \$57.00/lb. During this same period,
9 the published spot market price, which is referenced in a segment of long-term
10 contracts in order to establish delivery price, ranged from a low of \$34.00/lb to a
11 high of \$42.25/lb. DEP mitigates the impact of spot market volatility on the
12 portfolio of supply contracts by using a mixture of pricing mechanisms. DEP's
13 portfolio of diversified contract pricing yielded an average unit cost of \$48.97/lb for
14 uranium concentrates during the review period.

15 The decrease in market price for uranium concentrates during the review
16 period was primarily due to reduced demand following the Fukushima event in
17 March 2011. Consistent with its portfolio approach to contracting, DEP entered into
18 several long-term contracts during this period. Industry consultants, however,
19 believe market prices need to increase from current levels in order to provide the
20 economic incentive for the exploration, mine construction, and production necessary
21 to support future industry uranium requirements.

22 During the review period, the published long-term market price for
23 enrichment services was in the range of \$107.00/Separative Work Unit ("SWU") to

1 \$134.00/SWU. As in the uranium market, the decline in long-term market price for
2 enrichment services was primarily due to reduced demand following the Fukushima
3 event. The transition by enrichment suppliers from gaseous diffusion technology to
4 the more cost efficient gas centrifuge technology was also influential. The average
5 unit cost of DEP's purchases of enrichment services during the review period was
6 \$127.57/SWU. One hundred percent of DEP's enrichment purchases during the
7 review period were delivered under long-term contracts negotiated at market prices
8 prior to the review period. This included long-term contracts negotiated when
9 market prices had increased due to growing demand from the onset of the nuclear
10 renaissance. As described earlier in my testimony, however, staggering long-term
11 contracts over time for these components of the nuclear fuel cycle means DEP's
12 purchases within a given year consist of a blend of contract prices negotiated at
13 many different periods in the markets. This approach has the effect of smoothing
14 out DEP's exposure to price volatility.

15 Long-term prices for fabrication services generally trended upward during
16 the review period. For conversion services, long-term market prices remained
17 relatively stable, but spot market prices trended downward. These costs, however,
18 have a limited impact on the overall fuel expense rate given that the dollar amounts
19 for these purchases represent a substantially smaller percentage – 13% and 5%,
20 respectively, for the fuel batches recently loaded into DEP's reactors – of DEP's
21 total direct fuel cost relative to uranium concentrates or enrichment, which are 48%
22 and 34%, respectively.

1 **Q. PLEASE DESCRIBE THE RECENT DECISION OF THE D.C. CIRCUIT**
2 **COURT OF APPEALS REGARDING THE COLLECTION OF HIGH**
3 **LEVEL WASTE FEES BY THE DEPARTMENT OF ENERGY PURSUANT**
4 **TO THE NUCLEAR WASTE POLICY ACT.**

5 A. On November 19, 2013, the D.C. Circuit Court of Appeals issued a decision against
6 the U.S. Department of Energy ("DOE") in *Nat'l Ass'n of Regulatory Utility Com'rs*
7 *v. Dep't of Energy*, 736 F.3d 517 (D.C. Cir. 2013)("NARUC v. DOE"). I am not an
8 attorney and, therefore, am not giving a legal opinion, but my understanding from
9 reviewing the decision on my own is that the lawsuit challenged the DOE's
10 continued collection of the one-tenth of a cent per kilowatt-hour fee imposed by the
11 Nuclear Waste Policy Act ("NWPA") to pay for used fuel management and
12 disposal. My understanding is that the court in *NARUC v. DOE* required DOE to
13 "submit to Congress a proposal to change the fee to zero until such a time as either
14 the Secretary chooses to comply with the Act as it is currently written, or until
15 Congress enacts an alternative waste management plan."

16 **Q. HOW WILL THIS DECISION IMPACT DEP'S NUCLEAR FUEL COST?**

17 A. Under the NWPA, the fee remains in effect until DOE acts to propose the fee
18 adjustment to Congress, and the proposal has been before Congress for a minimum
19 of 90 days. Until that time, utilities continue to be obligated to make quarterly
20 Nuclear Waste Fund payments. At the current time, there is a high confidence that
21 there will be a change to the fee collection. Company witness McGee has proposed
22 a fuel and fuel-related factor which reflects the discontinuance of the payment
23 during the billing period. I will note, however, that the suspension of the DOE

1 waste fee may be temporary in nature with some likelihood that a nuclear waste fee
2 could be reinstated in the future.

3 **Q. WHAT CHANGES DO YOU SEE IN DEP'S NUCLEAR FUEL COST IN**
4 **THE BILLING PERIOD?**

5 A. The Company anticipates an increase in nuclear fuel costs on a cents per kWh basis
6 through the next billing period. Because fuel is typically expensed over two to three
7 operating cycles – roughly three to six years – DEP's nuclear fuel expense in the
8 upcoming billing period will be determined by the cost of fuel assemblies loaded
9 into the reactors during the review period, as well as prior periods. A portion of the
10 fuel residing in the reactors during the billing period will have been obtained under
11 historical contracts negotiated in attractive markets. Newer contracts signed prior to
12 recent market decreases, however, reflect increasing price trends, and are now
13 contributing to a portion of the uranium, enrichment, and fabrication costs reflected
14 in the total fuel expense. Also, as discussed earlier in my testimony, DEP is closely
15 following the ultimate legal determination regarding the collection of the nuclear
16 waste fee.

17 The average fuel expense, assuming DEP is able to cease collection of the
18 nuclear waste fee, is expected to decrease from 0.716 cents per kilowatt hour
19 ("kWh") incurred in the review period, to approximately 0.639 cents per kWh in the
20 billing period. This change does reflect the discharge of fuel with a lower cost basis
21 from the reactor and its replacement with fuel procured under new contracts
22 negotiated in higher markets, but decreases due to removal of the DOE waste fee.

1 **Q. WHAT STEPS IS DEP TAKING TO PROVIDE STABILITY IN ITS**
2 **NUCLEAR FUEL COSTS AND TO MITIGATE PRICE INCREASES IN**
3 **THE VARIOUS COMPONENTS OF NUCLEAR FUEL?**

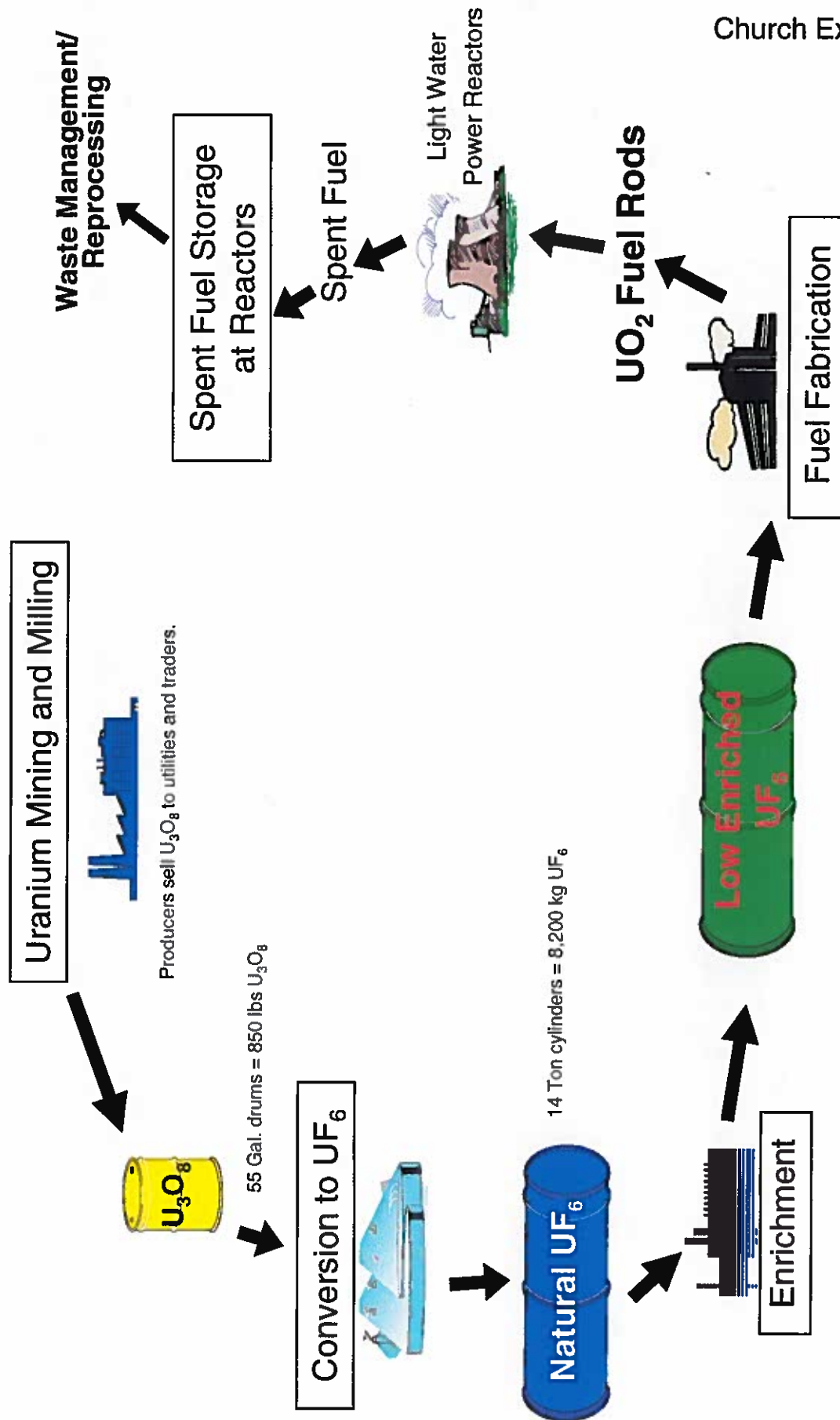
4 A. As I discussed earlier and as described in Church Exhibit 2, for uranium
5 concentrates, conversion, and enrichment services, DEP relies extensively on
6 staggered long-term contracts to cover the largest portion of its forward
7 requirements. By staggering long-term contracts over time and incorporating a
8 range of pricing mechanisms, DEP's purchases within a given year consist of a
9 blend of contract prices negotiated at many different periods in the markets, which
10 has the effect of smoothing out DEP's exposure to price volatility.

11 Although costs of certain components of nuclear fuel are expected to
12 increase in future years, nuclear fuel costs on a cents per kWh basis will likely
13 continue to be a fraction of the cents per kWh cost of fossil fuel. Therefore,
14 customers will continue to benefit from DEP's diverse generation mix and the strong
15 performance of its nuclear fleet through lower fuel costs than would otherwise result
16 absent the significant contribution of nuclear generation to meeting customers'
17 demands.

18 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

19 A. Yes, it does.

The Nuclear Fuel Cycle



Duke Energy Progress Nuclear Fuel Procurement Practices

The Company's nuclear fuel procurement practices are summarized below.

- Near and long-term consumption forecasts are computed based on factors such as: nuclear system operational projections given fleet outage/maintenance schedules, adequate fuel cycle design margins to key safety licensing limitations, and economic tradeoffs between required volumes of uranium and enrichment necessary to produce the required volume of enriched uranium.
- Nuclear system inventory targets are determined and designed to provide: reliability, insulation from short-term market volatility, and sensitivity to evolving market conditions. Inventories are monitored on an ongoing basis.
- On an ongoing basis, existing purchase commitments are compared with consumption and inventory requirements to ascertain additional needs.
- Qualified suppliers are invited to make proposals to satisfy additional or future contract needs.
- Contracts are awarded based on the most attractive evaluated offer, considering factors such as price, reliability, flexibility and supply source diversification/portfolio security of supply.
- For uranium concentrates, conversion and enrichment services, long term supply contracts are relied upon to fulfill the largest portion of forward requirements. By staggering long-term contracts over time, the Company's purchases within a given year consist of a blend of contract prices negotiated at many different periods in the markets, which has the effect of smoothing out the Company's exposure to price volatility. Due to the technical complexities of changing suppliers, fabrication services are generally sourced to a single domestic supplier on a plant-by-plant basis using multi-year contracts.
- Spot market opportunities are evaluated from time to time to supplement long-term contract supplies as appropriate based on comparison to other supply options.
- Delivered volumes of nuclear fuel products and services are monitored against contract commitments. The quality and volume of deliveries are confirmed by the delivery facility to which Duke Energy Progress has instructed delivery. Payments for such delivered volumes are made after Duke Energy Progress' receipt of such delivery facility confirmations.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-1-E**

In the Matter of)	
Annual Review of Base Rates)	DIRECT TESTIMONY OF
for Fuel Costs for)	SASHA J. WEINTRAUB FOR
Duke Energy Progress, Inc.)	DUKE ENERGY PROGRESS, INC.

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Alexander ("Sasha") J. Weintraub. My business address is 526 South
3 Church Street, Charlotte, North Carolina 28202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am Vice President, Fuels & Systems Optimization for Duke Energy Corporation
6 ("Duke Energy"). In that capacity I am responsible for the procurement of fossil
7 fuels and environmental reagents for the Duke Energy Progress, Inc. ("DEP" or the
8 "Company") and Duke Energy Carolinas, LLC ("DEC")(collectively, the
9 "Companies") generation fleet, as well as for the generation fleets of the other Duke
10 Energy regulated utilities. I am also responsible for portfolio management and short
11 term power trading for Duke Energy, and am responsible for the fossil fuel price
12 forecasts used for fuel filings and resource planning purposes for all of Duke
13 Energy's regulated utility subsidiaries, including DEP.

14 **Q. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATIONAL AND**
15 **PROFESSIONAL EXPERIENCE.**

16 A. I have a Bachelor of Science degree in Engineering from Rensselaer Polytechnic
17 Institute, a Master's in Mechanical Engineering from Columbia University, and a
18 Ph.D. in Industrial Engineering from North Carolina State University. From
19 February 2003 until June 2005, I was Director of Coal Marketing and Trading for
20 Progress Fuel Corporation, a former subsidiary of Progress Energy, Inc. ("Progress
21 Energy"). Subsequently, I was Director of Coal for DEP and Duke Energy Florida,
22 Inc. ("DEF"), and before assuming my current position, I was Vice President - Fuels
23 and Power Optimization for DEP and DEF.

1 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**
2 **PROCEEDINGS?**

3 A. Yes. I testified before the Public Service Commission of South Carolina in DEP's
4 2013 annual fuel proceeding in Docket No. 2013-1-E, as well as in DEC's 2013
5 annual fuel proceeding in Docket No. 2013-3-E. I also testified before this
6 Commission in Docket No. 2011-158-E, and I have testified on multiple occasions
7 on behalf of Duke Energy in proceedings before this and other state commissions.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
9 **PROCEEDING?**

10 A. The purpose of my testimony is to describe DEP's fossil fuel purchasing practices,
11 provide fossil fuel costs for the period March 1, 2013 through February 28, 2014
12 ("review period"), and describe changes forthcoming for the period July 1, 2014
13 through June 30, 2015 ("billing period"). I also provide an update from a
14 procurement and operations perspective on the Joint Dispatch Agreement ("JDA")
15 that – pursuant to the merger agreement between Duke Energy and Progress Energy
16 ("Merger") – Duke Energy is using to deliver savings to its North Carolina and
17 South Carolina customers, as well as fuel savings that DEP has realized to date on
18 behalf of its customers as a result of the Merger.

19 **Q. PLEASE PROVIDE A DESCRIPTION OF THE EXHIBITS TO YOUR**
20 **TESTIMONY.**

21 A. Weintraub Exhibit 1 summarizes the Company's Fossil Fuel Procurement Practices,
22 and Weintraub Exhibit 2 summarizes monthly contract and spot coal purchases

1 during the review period and the period of March 1, 2012 through February 28, 2013
2 ("prior review period").

3 **Q. WERE THESE EXHIBITS PREPARED BY YOU OR AT YOUR**
4 **DIRECTION?**

5 A. Yes, they were prepared at my direction.

6 **Q. PLEASE PROVIDE A SUMMARY OF DEP'S FOSSIL FUEL**
7 **PROCUREMENT PRACTICES.**

8 A. A summary of the Company's fossil fuel procurement practices is set out in
9 Weintraub Exhibit 1.

10 **Q. PLEASE DESCRIBE DEP'S DELIVERED COST OF COAL DURING THE**
11 **REVIEW PERIOD.**

12 A. The Company's average delivered coal cost per ton decreased less than 1.0% from
13 \$90.74 per ton from the prior review period to \$90.31 per ton in the review period.
14 The average transportation costs increased approximately 16%, from \$27.38 per ton
15 in the prior review period to \$31.83 per ton in the review period. The increase in
16 transportation costs reflects DEP's ability to use lower cost coals from non-Central
17 Appalachian regions, thereby lowering the overall delivered cost of coal.

18 **Q. PLEASE DESCRIBE THE LATEST TRENDS IN COAL MARKET**
19 **CONDITIONS.**

20 A. Coal markets continue to be in a state of flux due to a number of factors, including:
21 (1) recent U.S. Environmental Protection Agency regulations for power plants that
22 result in utilities retiring or modifying plants, which lower total domestic steam coal
23 demand, and can result in some plants shifting coal sources to different basins; (2)

1 softening demand in global markets for both steam and metallurgical coal; (3)
2 increased prices and volatility for gas due to adverse winter weather; (4) continued
3 increase in gas supply combined with installation of new combined cycle ("CC")
4 generation by utilities, especially in the Southeast, which also lowers overall coal
5 demand; and (5) increasingly stringent safety regulations for mining operations,
6 which result in higher costs and lower productivity.

7 **Q. HOW DO YOU EXPECT THESE TRENDS TO AFFECT DEP'S COAL**
8 **BURN AND INVENTORY LEVELS?**

9 A. Due to the increasing competitiveness for low cost electricity between natural gas
10 and coal, it is anticipated that DEP's coal generation will fluctuate with prevailing
11 market conditions. With the increase in natural gas prices in response to extreme
12 weather, DEP's actual coal burn for the review period was 7.6 million tons, which is
13 more than 40% higher than the 5.4 million tons originally anticipated in the currently
14 billed rate. The projected coal burn reflected in the rate proposed for the billing
15 period is 6.4 million tons. DEP's billing period projections for coal generation,
16 however, may be impacted due to changes in natural gas prices, volatile power
17 prices, and demand. Although inventory levels were below target at the end of the
18 review period as a result of much stronger than expected coal burns due to severe
19 winter weather and lower than expected receipts of coal, DEP has returned to near
20 target inventory levels as of the end of April 2014. Future inventory levels are
21 dependent on actual versus projected coal burns and actual coal deliveries based on
22 performance of the railroads.

1 **Q. WHAT IS THE PROJECTED AVERAGE DELIVERED COAL COST FOR**
2 **THE BILLING PERIOD?**

3 A. Combining coal and transportation costs, the Company projects average delivered
4 coal costs of approximately \$89.88 per ton for the billing period. This represents a
5 slight decrease from the review period actual cost. This projected cost, however, is
6 subject to change based on (1) changes in oil prices, which impact transportation
7 rates; (2) potential additional costs associated with suppliers' compliance with legal
8 and statutory changes, the effects of which can be passed on through coal contracts;
9 (3) performance of contract deliveries by suppliers and railroads which may not
10 occur despite the Company's strong contract compliance monitoring process; (4) the
11 amount of non-Central Appalachian coal the Company is able to consume; and (5)
12 the market prices for DEP's open coal positions that are prevalent at the time of
13 purchase.

14 **Q. WHAT STEPS IS DEP TAKING TO CONTROL COAL COSTS?**

15 A. The Company continues to maintain a comprehensive coal procurement strategy that
16 has proven successful over many years in limiting average annual coal price
17 increases and maintaining average coal costs at or well below those seen in the
18 marketplace. Aspects of this procurement strategy include having the appropriate
19 mix of contract and spot purchases, staggering contract expirations which thereby
20 limit exposure to market price changes, diversifying coal sourcing as economics
21 warrant, and pursuing contract extension options that provide flexibility to extend
22 terms within a particular price band.

23 The Company expects to address any spot and long-term coal requirements

1 throughout this year with any potential competitively bid purchases, if made, taking
2 into account projected coal burns, as well as coal inventory levels.

3 **Q. PLEASE DESCRIBE DEP'S PROCUREMENT PRACTICES FOR**
4 **NATURAL GAS.**

5 A. The Company's in-house personnel are responsible for natural gas contracting,
6 competitive procurement, scheduling, and balancing efforts for the gas generation
7 fleet. The Company has implemented gas procurement practices that include
8 periodic Request for Proposals ("RFPs"), market solicitations, and short-term market
9 engagement activities to procure a reliable, flexible, diverse, and competitively
10 priced natural gas supply that supports DEP's combustion turbine ("CT") and CC
11 facilities.

12 Lastly, as described in previous testimony filed in Docket No. 2013-1-E, in
13 December 2012 the Company received approval for the Asset Management and
14 Delivered Supply Agreement ("AMA") between DEP and DEC, which was
15 implemented on January 1, 2013. In the AMA, DEC is the designated Asset
16 Manager that procures and manages the combined gas supply needs for DEC and
17 DEP, and performs the necessary scheduling and balancing on the pipelines.

18 **Q. HOW IS NATURAL GAS DELIVERED TO DEP'S GENERATING**
19 **FACILITIES?**

20 A. The Company procures long-term firm transportation that provides natural gas to its
21 generating facilities. In addition, as needed, DEP may procure delivered supply,
22 shorter-term firm pipeline capacity through the capacity release market, and have

1 market supply options that provide the needed natural gas supply to its generating
2 facilities.

3 **Q. DOES DEP MAINTAIN AN INVENTORY OF NATURAL GAS?**

4 A. The Company has a storage agreement as part of the AMA. As the Asset Manager,
5 DEC will procure all the needed supply for the combined Carolinas gas needs and as
6 part of that agreement, will have access to the released storage agreement. On any
7 given day, DEC may utilize the storage to balance and support the Carolinas gas
8 needs.

9 **Q. WHAT CHANGES IN VOLUME DOES THE COMPANY ANTICIPATE**
10 **WITH NATURAL GAS CONSUMPTION?**

11 A. The Company's natural gas consumption is expected to continue to increase. The
12 Company consumed approximately 119 billion cubic feet ("Bcf") of natural gas in
13 the review period, compared to approximately 89 Bcf in the prior review period.
14 This increase was driven by the addition of new Lee CC generation at the end of
15 2012. In addition, DEP's Sutton CC went into service in the latter part of 2013. For
16 the billing period, DEP's current forecasted natural gas consumption is
17 approximately 131Bcf. The forecasted increase in natural gas consumption includes
18 a full year of generation from Sutton CC.

19 **Q. PLEASE DESCRIBE THE CURRENT STATE OF THE NATURAL GAS**
20 **MARKET, INCLUDING THE NATURAL GAS PRICES EXPERIENCED**
21 **DURING THE REVIEW PERIOD.**

22 A. The development of shale gas has created a fundamental shift in the nation's natural
23 gas market. Shale gas is natural gas that is trapped within shale formations, and

1 which can provide an abundant source of petroleum and natural gas. Within recent
2 years, improvements in production technologies have allowed greater access to the
3 natural gas trapped in these formations, and has resulted in increased reserves that
4 can produce natural gas supply more quickly and economically. Given continued
5 production increases, forward natural gas prices continue to remain at lower levels.
6 With respect to natural gas prices experienced during the recent Polar Vortex,
7 extreme weather and higher than normal natural gas demand resulted in DEP
8 experiencing much higher spot natural gas prices during January and February 2014
9 than it experienced in previous review periods. The Company's average price of gas
10 purchased for the review period was \$6.10 per Million British Thermal Units
11 ("MMBtu"), compared to \$5.03 per MMBtu during the prior review period.

12 **Q. PLEASE DESCRIBE THE OUTLOOK FOR THE NATURAL GAS**
13 **MARKET, INCLUDING THE EXPECTED NATURAL GAS PRICE TREND**
14 **FOR THE BILLING PERIOD.**

15 A. New production from shale gas has contributed to substantial increases in the supply
16 of U.S. marketed natural gas. This increase has outstripped demand growth. The
17 Company expects the shale gas production percentage of total natural gas domestic
18 production to continue to increase over time. The current forward prices for natural
19 gas reflect this continued increase in competitively priced supply with an average
20 delivered price of \$4.15 per MMBtu through the billing period.

21 **Q. IN LIGHT OF DEP'S INCREASED USAGE OF NATURAL GAS, WHAT IS**
22 **DEP DOING TO MITIGATE THE EFFECTS THAT INCREASING**
23 **NATURAL GAS PRICES COULD HAVE ON FUEL COSTS?**

1 A. The Company has been executing a natural gas hedging strategy for the last several
2 years in order to mitigate the price volatility of natural gas. The strategy
3 incorporates a “dollar-cost averaging” approach of hedging that financially “locks-
4 in” natural gas prices at a fixed price over time for a percentage of forecasted natural
5 gas burns. DEP will continue to monitor and make adjustments as necessary to its
6 natural gas hedging program.

7 **Q. PLEASE EXPLAIN THE JDA BETWEEN DEP AND DEC.**

8 A. As explained in my previous testimony filed in Docket No. 2013-1-E, the JDA is an
9 agreement between DEP and DEC where DEC acts as the Joint Dispatcher for
10 DEP’s and DEC’s power supply resources. The JDA has allowed DEP’s and DEC’s
11 generation resources to be dispatched as a single system to meet the two utilities’
12 retail and firm wholesale customers’ requirements at the lowest possible cost. As a
13 result, the joint dispatch process allows DEP and DEC to serve their retail and
14 wholesale native load customers more efficiently and economically than they can on
15 a stand-alone basis. The JDA also provides a methodology for calculating the
16 savings generated by the joint dispatch process and for equitably allocating the
17 savings between DEP and DEC.

18 The joint dispatch savings automatically flow through to the Companies’
19 retail customers through their fuel clauses. For native load wholesale customers, the
20 joint dispatch savings are passed through as permitted by the applicable wholesale
21 contracts. Under the joint dispatch process, the energy cost attributable to each
22 utility’s native load are the costs actually incurred by the utility for energy allocated
23 to native load service, adjusted by the cost allocation payments calculated by the

1 Joint Dispatcher, which are treated as purchases and sales between the Companies.
2 As a result, the energy cost ultimately incurred by DEP and DEC to serve their
3 respective native loads will be equal to the stand-alone costs they would have
4 incurred but for the joint dispatch arrangement, less each utility's share of the joint
5 dispatch savings.

6 Through March 2014, the combined merger savings from the JDA and the
7 Companies' fuel procurement activities are \$274 million. DEP's and DEC's
8 customers are then allocated their share of the combined savings based upon the
9 resource ratios of the combined company. This resource ratio is 38% for DEP and
10 62% for DEC through March 2014.

11 **Q. HOW DOES THE COMPANY OPERATE ITS PORTFOLIO OF**
12 **GENERATION ASSETS TO RELIABLY AND ECONOMICALLY SERVE**
13 **ITS CUSTOMERS?**

14 A. Both DEP and DEC utilize the same process to ensure that the assets of the
15 Companies are reliably and economically available to serve their respective
16 customers. To that end, both companies consider the latest forecasted fuel prices,
17 outages at the generating units based on planned maintenance and refueling
18 schedules, forced outages at generating units based on historical trends, generating
19 unit performance parameters, and expected market conditions associated with power
20 purchases and off-system sales opportunities in order to determine the most
21 economic and reliable means of serving their customers.

22 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

23 A. Yes, it does.

Duke Energy Progress, Inc. Fossil Fuel Procurement Practices

Coal

- Near and long-term consumption forecasts are computed based on factors such as: load projections, fleet maintenance and availability schedules, coal quality and cost, environmental permit and emissions considerations, wholesale energy imports and exports.
- Station and system inventory targets are determined and designed to provide: reliability, insulation from short-term market volatility, and sensitivity to evolving coal production and transportation conditions. Inventories are monitored continuously.
- On a continuous basis, existing purchase commitments are compared with consumption and inventory requirements to ascertain additional needs.
- All qualified suppliers are invited to make proposals to satisfy any additional or future contract needs.
- Contracts are awarded based on the lowest evaluated offer, considering factors such as price, quality, transportation, reliability and flexibility.
- Spot market solicitations are conducted on an on-going basis to supplement contract purchases.
- Delivered coal volume and quality are monitored against contract commitments. Coal and freight payments are calculated based on certified scale weights and coal quality analysis meeting ASTM standards. During the review period the Company utilized both destination and/or origin weights and analysis.

Gas

- Near and long-term consumption forecasts are computed based on factors such as load projections, commodity and emission prices, and fleet maintenance and availability schedules.
- Short-term and Long-term Periodic Requests for Proposals and informal market solicitations will be conducted to potential suppliers to procure a cost competitive, secure and reliable natural gas supply over time to meet forecasted gas usage.
- Short-term and spot purchases are conducted on an on-going basis to supplement term natural gas supply.
- On a continuous basis, existing purchases are compared to forecasted gas usage to ascertain any additional needs.

Fuel Oil

- No. 2 diesel is burned primarily for initiation of coal combustion (light-off at steam plants) and in combustion turbines (peaking assets).
- All diesel fuel is moved via pipeline to applicable terminals where it is then loaded on trucks for delivery into the Company's storage tanks. Because oil usage is highly variable, the Company relies on a combination of inventory and reliable suppliers who are responsive and can access multiple terminals. Diesel is replaced on an "as needed basis" as called for by station personnel with guidance from fuel procurement staff.

WEINTRAUB EXHIBIT 1

- Formal solicitation for supply is conducted as needed with an emphasis on maintaining a network of reliable suppliers at a competitive market price in the region of our generating assets.

DUKE ENERGY PROGRESS
Summary of Coal Purchases
Twelve Months Ended February 2014 & 2013
Tons

<u>Line</u> <u>No.</u>	<u>Month</u>	<u>Contract</u> <u>(Tons)</u>	<u>Spot</u> <u>(Tons)</u>	<u>Total</u> <u>(Tons)</u>
1	March 2013	502,344	0	502,344
2	April	365,100	0	365,100
3	May	428,174	0	428,174
4	June	554,544	0	554,544
5	July	631,953	0	631,953
6	August	735,088	0	735,088
7	September	761,610	0	761,610
8	October	479,841	0	479,841
9	November	592,803	11,701	604,504
10	December	548,247	22,864	571,111
11	January 2014	409,842	23,533	433,375
12	February	272,292	159,621	431,913
13	Total (Sum L1:L12)	6,281,838	217,719	6,499,557

<u>Line</u> <u>No.</u>	<u>Month</u>	<u>Contract</u> <u>(Tons)</u>	<u>Spot</u> <u>(Tons)</u>	<u>Total</u> <u>(Tons)</u>
14	March 2012	780,531	12,809	793,340
15	April	595,721	0	595,721
16	May	688,255	0	688,255
17	June	957,296	206	957,502
18	July	759,349	0	759,349
19	August	878,974	2,277	881,250
20	September	826,079	0	826,079
21	October	864,605	0	864,605
22	November	725,227	0	725,227
23	December	890,910	1,217	892,127
24	January 2013	471,048	2,448	473,497
25	February	498,700	491	499,191
26	Total (Sum L14:L25)	8,936,695	19,448	8,956,143

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-1-E**

In the Matter of)	DIRECT TESTIMONY OF
Annual Review of Base Rates)	T. PRESTON GILLESPIE, JR. FOR
for Fuel Costs for)	DUKE ENERGY PROGRESS, INC.
Duke Energy Progress, Inc.)	

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is T. Preston Gillespie, Jr. and my business address is 526 South Church
3 Street, Charlotte, North Carolina.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am Senior Vice President of Nuclear Operations for Duke Energy Carolinas, LLC
6 ("DEC"). I have executive accountability for DEC's Oconee Nuclear Station
7 ("Oconee") in Seneca, South Carolina, and Duke Energy Progress, Inc.'s ("DEP" or
8 the "Company") Robinson Nuclear Generating Station ("Robinson") near Hartsville,
9 South Carolina.

10 **Q. WHAT ARE YOUR RESPONSIBILITIES AS SENIOR VICE PRESIDENT**
11 **OF NUCLEAR OPERATIONS FOR OCONEE AND ROBINSON?**

12 A. As Senior Vice President of Nuclear Operations for Oconee and Robinson, I am
13 responsible for providing executive oversight for the safe and reliable operation of
14 those nuclear stations.

15 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
16 **PROFESSIONAL EXPERIENCE.**

17 A. I have a Bachelor's degree in Mechanical Engineering from Clemson University. I
18 am a registered professional engineer in South Carolina, and held a senior operator
19 license from the U.S. Nuclear Regulatory Commission ("NRC"). I began my career
20 with DEC (formerly known as Duke Power Company) in 1986 as an assistant
21 engineer at Oconee. Since that time, I have held various roles of increasing
22 responsibility in engineering, work management, and operations, including
23 operations shift manager, and nuclear engineering manager in 2004 responsible for

1 managing the nuclear and electrical engineering activities at Oconee. I was named
2 operations manager at Catawba Nuclear Station in 2007, and in 2008 I became plant
3 manager at Oconee, transitioning to site vice president in September 2010. I
4 assumed my current role in March 2013.

5 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**
6 **PROCEEDINGS?**

7 A. Yes. I testified before the Public Service Commission of South Carolina in DEP's
8 2013 annual fuel proceeding in Docket No. 2013-1-E.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
10 **PROCEEDING?**

11 A. The purpose of my testimony is to describe and discuss the performance of
12 Brunswick Nuclear Station ("Brunswick"), Shearon Harris Nuclear Station
13 ("Harris"), and Robinson for the period of March 1, 2013 through February 28, 2014
14 (the "review period").

15 **Q. YOUR TESTIMONY INCLUDES THREE EXHIBITS. WERE THESE**
16 **EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER**
17 **YOUR SUPERVISION?**

18 A. Yes. These exhibits were prepared at my direction and under my supervision.

19 **Q. PLEASE PROVIDE A DESCRIPTION OF THE EXHIBITS.**

20 A. The exhibits and descriptions are as follows:

21 Gillespie Exhibit 1 - Calculation of the nuclear capacity factor for the
22 review period pursuant to § 58-27-865 of the Code of

Laws of South Carolina ("S.C. Code Ann." or the "Code")

Gillespie Exhibit 2 - Nuclear outage data for the review period

Gillespie Exhibit 3 - Nuclear outage data for the billing period¹

Q. PLEASE DESCRIBE DEP'S NUCLEAR GENERATION PORTFOLIO.

A. The Company's nuclear generation portfolio consists of approximately 3,050 megawatts ("MWs") of generating capacity, made up as follows:

Brunswick - 1,527 MWs²

Harris - 778 MWs³

Robinson - 741 MWs

Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF DEP'S NUCLEAR GENERATION ASSETS.

A. The Company's nuclear fleet consists of three generating stations and a total of four units. Brunswick is a boiling water reactor facility with two units located just north of Southport, North Carolina, and was the first nuclear plant built in North Carolina. Unit 2 began commercial operation in 1975, followed by Unit 1 in 1977. The operating licenses for Brunswick were renewed in 2006 by the NRC, extending operations up to 2036 and 2034 for Units 1 and 2, respectively. Harris, located in New Hill, North Carolina, is a pressurized water reactor that began commercial operation in 1987. The NRC issued a renewed license for Harris in 2008, extending operations up to 2046. Brunswick and Harris are jointly owned with the North Carolina Eastern Municipal Power Agency. Robinson is a single unit pressurized

¹ This data is provided in confidential and publicly redacted versions for security purposes.

² Represents DEP's ownership share of 81.67%.

³ Represents DEP's ownership share of 83.83%.

1 water reactor located near Hartsville, South Carolina that began commercial
2 operation in 1971. The license renewal for Robinson Unit 2 was issued by the NRC
3 in 2004, extending operation for Robinson up to 2030.

4 **Q. WHAT ARE DEP'S OBJECTIVES IN THE OPERATION OF ITS**
5 **NUCLEAR GENERATION ASSETS?**

6 A. The primary objective of DEP's nuclear generation department is to safely provide
7 reliable and cost-effective electricity to DEP's Carolinas customers. The Company
8 achieves this objective by focusing on a number of key areas. Operations personnel
9 and other station employees are well-trained and execute their responsibilities to the
10 highest standards in accordance with detailed procedures. The Company maintains
11 station equipment and systems reliably, and ensures timely implementation of work
12 plans and projects that enhance the performance of systems, equipment, and
13 personnel. Station refueling and maintenance outages are conducted through the
14 execution of well-planned, well-executed, and high quality work activities, which
15 effectively ready the plant for operation until the next planned outage.

16 **Q. PLEASE DISCUSS THE PERFORMANCE OF DEP'S NUCLEAR FLEET**
17 **DURING THE REVIEW PERIOD.**

18 A. Overall, DEP's nuclear stations operated well during the review period, and supplied
19 43.7% of the power used by its Carolinas customers. The four nuclear units
20 operated at an actual system average capacity factor of 86.77%, with Brunswick
21 Unit 1 achieving an actual capacity factor of 98.3%. Robinson completed a breaker-
22 to-breaker run of 531 days leading into the fall refueling and maintenance outage

1 that began on September 14, 2013, marking a new record and besting the previous
2 record of 517 days, which was set in 2002.

3 The Company continues to look for ways to improve the operations of its
4 nuclear fleet, which, as shown on Gillespie Exhibit 1, achieved a net nuclear
5 capacity factor, excluding reasonable outage time pursuant to S.C. Code Ann. § 58-
6 27-865(F), of 102.21% for the review period. This capacity factor is above the
7 92.5% set forth in this section of the Code, which states in pertinent part:

8 There shall be a rebuttable presumption that an electrical utility made
9 every reasonable effort to minimize cost associated with the
10 operation of its nuclear generation facility or system, as applicable, if
11 the utility achieved a net capacity factor of ninety-two and one-half
12 percent or higher during the period under review. The calculation of
13 the net capacity factor shall exclude reasonable outage time
14 associated with reasonable refueling, reasonable maintenance,
15 reasonable repair, and reasonable equipment replacement outages;
16 the reasonable reduced power generation experienced by nuclear
17 units as they approach a refueling outage; the reasonable reduced
18 power generation experienced by nuclear units associated with
19 bringing a unit back to full power after an outage....
20

21 The performance results discussed above support DEP's continued commitment for
22 achieving high performance without compromising safety and reliability.

23 **Q. WHAT IMPACTS A UNIT'S AVAILABILITY AND WHAT IS DEP'S**
24 **PHILOSOPHY FOR SCHEDULING REFUELING AND MAINTENANCE**
25 **OUTAGES?**

26 A. In general, refueling requirements, maintenance requirements, prudent maintenance
27 practices, and NRC operating requirements impact the availability of DEP's nuclear
28 system. Prior to a planned outage, DEP develops a detailed schedule for the outage
29 and for major tasks to be performed including sub-schedules for particular activities.

1 The Company's scheduling philosophy is to plan for a best possible outcome
2 for each outage activity within the outage plan. For example, if the "best ever" time
3 an outage task was performed is 10 days, then 10 days or less becomes the goal for
4 that task in each subsequent outage. Those individual goals are incorporated into an
5 overall outage schedule. The Company aggressively works to meet, and measures
6 itself against, that schedule. Further, to minimize potential impacts to outage
7 schedules, "discovery activities" (walk-downs, inspections, etc.) are scheduled at the
8 earliest opportunities so that any maintenance or repairs identified through those
9 activities can be promptly incorporated into the outage plan.

10 As noted, the schedule is utilized for measuring outage planning and
11 execution, and driving continuous improvement efforts. However, in order to
12 provide reasonable, rather than best ever, total outage time for planning purposes,
13 particularly with the dispatch and system operating center functions, DEP also
14 develops an allocation of outage time which incorporates reasonable schedule losses.
15 The development of each outage allocation is dependent on maintenance and repair
16 activities included in the outage, as well as major projects to be implemented during
17 the outage. Both schedule and allocation are set aggressively to drive continuous
18 improvement in outage planning and execution.

19 **Q. HOW DOES DEP HANDLE OUTAGE EXTENSIONS AND FORCED**
20 **OUTAGES?**

21 **A.** When an outage extension becomes necessary, DEP believes that work completed in
22 the extension results in longer continuous run times and fewer forced outages,
23 thereby reducing fuel costs in the long run. Therefore, if an unanticipated issue that

1 has the potential to become an on-line reliability issue is discovered while a unit is
2 off-line for a scheduled outage and repair cannot be completed within the planned
3 work window, the outage is usually extended to perform necessary maintenance or
4 repairs prior to returning the unit to service. In the event that a unit is forced off-
5 line, every effort is made to safely perform the repair and return the unit to service as
6 quickly as possible.

7 **Q. DOES DEP PERFORM POST OUTAGE CRITIQUES AND CAUSE**
8 **ANALYSES FOR INTERNAL IMPROVEMENT EFFORTS?**

9 A. Yes. The Nuclear industry recognizes that constant focus on raising standards and
10 excellence in operations results in improved nuclear safety and reliability. As such,
11 DEP applies self-critical analysis to each outage and, using the benefit of hindsight,
12 identifies every potential cause of an outage delay or event resulting in a forced or
13 extended outage, and applies lessons learned to drive continuous improvement. The
14 Company also evaluates the performance of each function and discipline involved in
15 outage planning and execution from the perspective of identifying areas in which it
16 can utilize self-critical observation for improvement efforts. Given this focus on
17 identifying opportunities for improvement, these critiques and cause analyses do not
18 document the broader context of the outage or event, and rarely reflect DEP's
19 strengths and successes.

20 As an example, the Brunswick Unit 2 alternate decay heat removal
21 ("ADHR") project "lessons learned" significantly benefitted a condensate margin
22 improvement project for Brunswick Unit 1 with respect to piping and support
23 system installation. The extensive use of metrology, prefabrication work, granular

1 resource loaded scheduling, and robust oversight not only contributed to meeting the
2 project schedule, but also contributed to the Brunswick team's success in avoiding
3 adverse impacts to the overall refueling and maintenance outage.

4 **Q. WHAT OUTAGES WERE REQUIRED FOR REFUELING AND**
5 **MAINTENANCE AT DEP'S NUCLEAR FACILITIES DURING THE**
6 **REVIEW PERIOD?**

7 A. There were three refueling and maintenance outages during the review period and
8 additional time was required for two of these outages to complete activities needed
9 for on-line reliability. The spring 2013 refueling and maintenance outage on
10 Brunswick Unit 2 was allocated for 55 days and required a 13-day extension, most
11 notably due to installation of the ADHR system, an upgraded replacement to the
12 aging and obsolete vintage system, and emergent replacement of both safety-related
13 transformers. Other major work completed during the Unit 2 outage at Brunswick
14 included replacement of the auxiliary transformer, installation of a drywell camera
15 for on-line leakage monitoring, guide pad repairs on the main steam isolation valves,
16 implementation of a variable frequency drive software upgrade to improve
17 reliability, and completion of 292 flow accelerated corrosion inspections of main
18 steam cross-under piping, as well as a vessel internals inspection. The Company
19 also de-sludged the Torus - which is a pool of water used to suppress or cool the
20 reactor coolant in an accident - to reduce radiation dose and improve safety system
21 suction strainer design margins, and modified the feedwater pump main oil pumps to
22 improve reliability. In total, DEP completed 16,678 activities within this outage.

1 The refueling and maintenance outage for Robinson began in September
2 2013. The outage was allocated at 55 days and was completed 2.5 days ahead of
3 that allocation. Both primary and secondary maintenance efforts were completed for
4 the reactor vessel, steam generators, reactor coolant pumps, and heat exchangers
5 along with maintenance activities for the turbine/generator, main feedwater pumps,
6 service water, and condensers. Major activities completed included inspections of
7 the reactor vessel cold leg nozzles and injection valves, bottom mounted
8 instrumentation, core barrel upper and lower girth weld and lower flange, primary
9 bowl cladding, and steam generator dome and upper support plate. Replacements
10 included the reactor coolant pump seal return isolation valve and motor, spray
11 discharge isolations, and the residual heat removal ("RHR") pump motor and seal,
12 along with the RHR heat exchanger outlet bonnet gasket. The Company also
13 completed upgrades for lube oil filtration and seal oil cooler tube bundle for the
14 turbine/generator, and a coupling design upgrade for the main feedwater pump. In
15 total, DEP completed 12,361 refueling and maintenance activities within this outage.

16 Harris also began a refueling and maintenance outage in the fall of 2013
17 which was allocated for 26 days and required an extension of 6 days primarily due to
18 repairs prompted by the discovery of a penetration in a reactor head nozzle during
19 inspection. Major work activities during this outage included replacement of the
20 turbine driven auxiliary feedwater control panel, reactor vessel head penetration
21 inspection, check valve inspections, replacement of a safety related cooling coil in
22 containment fan cooler, draining and repair of containment spray additive tank
23 welds, emergency diesel generator ("EDG") governor replacement, and replacement

1 of solid state protection system cards on the B Train. In total, DEP completed
2 11,399 activities within this outage.

3 **Q. WHAT MEASURES HAS DEP TAKEN TO MAINTAIN THE GOOD**
4 **PERFORMANCE OF ITS NUCLEAR FLEET?**

5 A. At Brunswick, safety and plant reliability are also a key focus with improvements
6 associated with diesel generator reliability and switchyard reliability. Efforts include
7 installation of a supplemental generator, EDG starting air modifications and fuel oil
8 piping replacement, and transmission insulator replacements. Other recently
9 completed improvements include installation of on-line noble chemistry for Unit 1,
10 which improves radiological safety and reduces worker dose, and flooding
11 mitigation improvements that involved implementation of "Cliff Edge"
12 modifications installing barriers and wave deflectors to address NRC requirements
13 stemming from the Fukushima event in 2011. Brunswick is in the final stages of
14 completing replacement of the fire detection system in the control building, which is
15 on schedule for completion later this year. Turbine building chiller replacement is
16 scheduled to complete in 2015, and governor and voltage regulator replacements for
17 the EDGs will be completed over the next few years.

18 At Harris, projects are underway to improve reliability, address end-of-life
19 equipment, and perform upgrades required to comply with current industry
20 standards. Recently completed upgrades include structural stiffening of the low
21 pressure turbine supports, non-safety transformer replacements, new heater drain
22 system control components, repair of the reactor vessel head penetrations, and new
23 EDG governors. Ongoing major replacement projects include the "C" air

1 compressor, which is on schedule for completion in July 2014, and start-up
2 transformer cable rerouting with cable replacement completion in June 2014 with
3 old cable removal scheduled for completion in 2015. The Company is also
4 upgrading the start-up transformer oil-filled cable, eliminating the underground
5 cable, and replacing it with overhead cable to meet updated standards and address
6 environmental concerns with age and leakage. In addition, DEP has implemented a
7 breaker and dry type transformer breaker replacement program at Harris, along with
8 the replacement of the fire detection system, both of which are projected to finish in
9 2017. The 2018 projection includes replacement of the reactor vessel head based on
10 industry recommendation and to address end-of-life.

11 At Robinson, engineering, operations, and maintenance teams have
12 continued the momentum of making significant improvements in system and
13 component performance. The Company's development of high intensity teams for
14 major modification work included in the fall 2013 outage proved successful along
15 with enhanced training and qualification program efforts. Other efforts underway
16 include implementing upgrades to primary coolant system and steam generator
17 make-up capability, as well as electrical modifications for backup power to support
18 Fukushima requirements. Completion of a new on-site building for storage of
19 reusable contaminated equipment for outages is on schedule for the end of 2014.
20 This effort will greatly improve load-in and load-out of containment in future
21 outages. With the projected 2015 installation of new Westinghouse shutdown
22 reactor coolant pump seals on all three pumps, DEP is also reducing risk of core
23 damage from a loss of seal cooling.

1 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

2 **A. Yes, it does.**

DUKE ENERGY PROGRESS
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS
NUCLEAR CAPACITY FACTOR PURSUANT TO S.C. CODE ANN. § 58-27-865(F)
REVIEW PERIOD OF MARCH 2013 THROUGH FEBRUARY 2014

1	Nuclear System Actual Net Generation During Review Period	26,901,281 MWH
2	Total Number of Hours During 2013 portion of Review Period	8,760
3	Nuclear System MDC During 2013 portion of Review Period	3,539 MW
4	Reasonable Nuclear System Reductions	4,683,239 MWH
5	Nuclear System Capacity Factor $((L1/(L2a*L3a)-L4)*100$	<u>102.21</u> %

DUKE ENERGY PROGRESS
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS
NUCLEAR OUTAGE DATA FOR REVIEW PERIOD OF
MARCH 2013 THROUGH FEBRUARY 2014

Nuclear Outages Lasting One Week Or More - Review Period

Station/Unit	Date of Outage	Explanation of Outage
Brunswick 1	5/18/2013-5/29/2013	Scheduled maintenance to address recirculation pump 1B seal degradation and replace 2 safety related transformers.
Brunswick 2	3/2/2013-5/9/2013	Scheduled Refueling - EOC 21; includes 13 day extension.
Harris 1	5/15/2013-6/7/2013	Unscheduled maintenance to repair head penetration.
Harris 1	11/9/2013-12/11/2013	Scheduled Refueling - EOC 18; includes 6 day extension.
Robinson 2	9/14/2013-11/4/2013	Scheduled Refueling - EOC 28.

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2014-1-E

In Re:

**Duke Energy Progress, Inc. Annual
Review of Base Rates for Fuel Costs**

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**T. PRESTON GILLESPIE, JR.
CONFIDENTIAL EXHIBIT 3**

FILED UNDER SEAL

MAY 8, 2014

DUKE ENERGY PROGRESS
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS
NUCLEAR OUTAGE SCHEDULE FOR BILLING PERIOD OF
JULY 2014 THROUGH JUNE 2015

Scheduled Nuclear Outages Lasting One Week Or More - Billing Period

Station/Unit	Date of Outage ¹	Explanation of Outage
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REDACTED

¹ This exhibit represents DEP's current plan, which is subject to change based on fluctuations in operational and maintenance requirements.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-1-E**

In the Matter of
Annual Review of Base Rates
for Fuel Costs for
Duke Energy Progress, Inc.

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**DIRECT TESTIMONY OF
KIMBERLY D. MCGEE FOR DUKE
ENERGY PROGRESS, INC.**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Kimberly D. McGee, and my business address is 550 South Tryon
3 Street, Charlotte, North Carolina.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am a Rates Manager supporting both Duke Energy Progress, Inc. ("DEP" or the
6 "Company") and Duke Energy Carolinas, LLC ("DEC")(collectively, the
7 "Companies").

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
9 **PROFESSIONAL EXPERIENCE.**

10 A. I graduated from the University of North Carolina at Charlotte with a Bachelor of
11 Science degree in Accountancy. I am a certified public accountant licensed in the
12 State of North Carolina. I began my career in 1989 with Deloitte and Touche,
13 LLP as a staff auditor. In 1992, I began working with DEC (formerly known as
14 Duke Power Company) as a staff accountant and have held a variety of positions
15 in the finance organization. From 1997 until 2009, I worked for Wachovia Bank
16 (now known as Wells Fargo) in a variety of finance and regulatory positions. I
17 rejoined DEC in January 2009 as a Lead Accountant in Financial Reporting. I
18 joined the Rates Department in 2011 as Manager, Rates and Regulatory Filings.

19 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**
20 **PROCEEDINGS?**

21 A. No. I have not previously testified before the Public Service Commission of
22 South Carolina ("PSCSC" or the "Commission"). I have previously testified,
23 however, before the North Carolina Utilities Commission supporting the rate

1 calculation for DEC's Demand Side Management and Energy Efficiency Rider in
2 Docket No. E-7, Sub 1031.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. The purpose of my testimony is to provide DEP's actual fuel and environmental
5 cost data for March 1, 2013 through February 28, 2014 (the "review period"), the
6 projected fuel and environmental cost information for March 1, 2014 through
7 June 30, 2014 (the "forecast period"), and DEP's proposed fuel factors by
8 customer class for July 1, 2014 through June 30, 2015 (the "billing period"). I
9 will provide six exhibits to support my testimony.

10 **Q. WHAT IS THE SOURCE OF THE ACTUAL INFORMATION AND DATA**
11 **FOR THE REVIEW PERIOD?**

12 A. Actual test period kilowatt hour ("kWh") generation, kWh sales, fuel-related
13 revenues, and fuel-related expenses were taken from DEP's books and records.
14 These books, records, and reports of DEP are subject to review by the appropriate
15 regulatory agencies in the three jurisdictions that regulate DEP's electric rates.

16 In addition, independent auditors perform an annual audit to provide
17 assurance that, in all material respects, internal accounting controls are operating
18 effectively and DEP's financial statements are accurate.

19 **Q. DOES DEP PURCHASE POWER AND HOW ARE THESE COSTS**
20 **RECORDED?**

21 A. Yes. The Company continuously evaluates purchasing power if it can be reliably
22 procured and delivered at a price that is less than the variable cost of DEP's
23 generation. In accordance with § 58-27-865(A) of the Code of Laws of South

1 Carolina ("S.C. Code Ann." or the "Code"), DEP recovers from its South
2 Carolina retail customers an amount that is the lower of the purchase price or
3 DEP's avoided variable cost for generating an equivalent amount of power for its
4 economy purchases.

5 The Company also purchases power from certain suppliers that are treated
6 as firm generation capacity purchases. In accordance with the statute, all amounts
7 paid to these suppliers are recorded as recoverable fuel costs with the exception of
8 capacity charges. DEP also purchases (and sells) power to DEC as a result of the
9 Joint Dispatch Agreement ("JDA") described in Company witness Weintraub's
10 testimony. According to his testimony, under the joint dispatch process, the
11 energy cost attributable to each utility's native load are the costs actually incurred
12 by the utility for energy allocated to native load service, adjusted by the cost
13 allocation payments calculated by the Joint Dispatcher, which are treated as
14 purchases and sales between the Companies.

15 **Q. PLEASE EXPLAIN MCGEE EXHIBIT NO. 1.**

16 A. McGee Exhibit No. 1 is a summary of DEP's recommended base fuel rate of
17 2.981¢/kWh for the billing period, consisting of a projected component of 2.654
18 ¢/kWh for the recovery of the South Carolina retail share of the \$1.5 billion of
19 projected system fuel expense, and a true-up component of 0.304¢/kWh to collect
20 the projected \$19.6 million under-recovery from South Carolina customers.
21 DEP's recommended Environmental rate of .042¢/kWh consists of a projected
22 component of 0.058¢/kWh for the recovery of \$1.4 million of projected South
23 Carolina environmental expenses, and a true-up component of (0.016)¢/kWh to

1 return to South Carolina customers \$0.4 million of over-recovery. The
2 environmental factor for General Service demand customers is 14¢/kW to recover
3 \$1.3 million of projected South Carolina environmental expenses offset by a true-
4 up component of \$69,385 of over-collections.

5 **Q. HOW DID DEP'S FUEL REVENUE BILLINGS COMPARE TO THE**
6 **FUEL COSTS INCURRED DURING THE MARCH 2013 TO JUNE 2014**
7 **TIME PERIOD?**

8 A. McGee Exhibit No. 2 is a monthly comparison of fuel revenues billed to South
9 Carolina retail customers to the actual and estimated jurisdictional fuel costs
10 attributable to those sales. As shown on Exhibit 2, the projected DEP fuel
11 recovery status at June 30, 2014 is an under-recovery of \$19.6 million. This
12 balance is primarily the result of extreme weather conditions in January of 2014
13 which resulted in higher fuel costs.

14 **Q. PLEASE EXPLAIN MCGEE EXHIBIT NO. 3.**

15 A. McGee Exhibit No. 3 presents DEP's recommended projected base fuel rate of
16 2.654¢/kWh for the billing period for the recovery of South Carolina retail share
17 of \$1.5 billion of projected system fuel expense.

18 The fuel forecast supporting the projected fuel cost was generated by an
19 hourly dispatch model that considers the latest forecasted fuel prices, outages at
20 the generating plants based on planned maintenance and refueling schedules,
21 forced outages based on historical trends, generating unit performance
22 parameters, and expected market conditions associated with power purchase and
23 off-system sales opportunities. In addition, the forecasting model reflects the

1 joint dispatch of the combined power supply resources of DEP and DEC as
2 described by Company witness Weintraub.

3 **Q. PLEASE PROVIDE A STATUS UPDATE OF ENVIRONMENTAL COST**
4 **COLLECTION AND EXPLAIN HOW THESE COSTS HAVE BEEN**
5 **TREATED IN THIS FILING.**

6 A. During the review period, DEP recovered variable environmental costs and the
7 costs of emission allowances through the environmental component of the fuel
8 rate. Environmental costs allocated to the South Carolina retail jurisdiction
9 during the review period were approximately \$2.0 million as shown on McGee
10 Exhibit No. 4. The Company currently estimates that its deferred environmental
11 cost balance will be an over-collection of \$0.4 million at June 30, 2014.

12 **Q. HAVE YOU PROVIDED A FORECAST OF ENVIRONMENTAL COSTS?**

13 A. Yes, McGee Exhibit No. 5 presents DEP's estimated system environmental costs
14 for the billing period of \$23.0 million. The South Carolina retail portion is
15 forecasted to be approximately \$2.7 million.

16 **Q. PLEASE DESCRIBE EMISSION-REDUCING CHEMICALS THAT DEP**
17 **WILL INCLUDE IN THE PROPOSED FUEL RATE IN THIS FILING.**

18 A. As Company witness Miller explains more specifically in his testimony, DEP uses
19 emission-reducing chemicals at its fossil/hydro plants to help it provide low cost,
20 reliable electric generation for its customers while also complying with state and
21 federal environmental control obligations. As a result, DEP has included the cost
22 of magnesium hydroxide, calcium carbonate, ammonia, urea, limestone, lime, and

1 hydrated lime incurred during the review period in its fuel cost recovery
2 application.

3 **Q. HOW DID DEP ALLOCATE ENVIRONMENTAL COSTS?**

4 A. Environmental costs were allocated to Residential, General Service (non-
5 demand), and General Service (demand) rate classes based upon the coincident
6 peak experienced during the review period. This allocation is shown on McGee
7 Exhibit No. 4. Rates were designed based on costs allocated to the respective rate
8 classes and the projected energy consumption for the Residential and General
9 Service (non-demand) schedules. The rate for the General Service (demand) class
10 was based on projected annual demand. All allocations were consistent with the
11 methodology approved by this Commission in DEP's 2007 fuel review
12 proceeding, Order No. 2007-440 issued July 20, 2007. This methodology has
13 been consistently used in each fuel case since the issuance of this Order.

14 **Q. HAVE YOU PRESENTED DEP'S PROPOSED FUEL FACTORS?**

15 A. Yes. McGee Exhibit No. 1 presents proposed fuel rates including an amount
16 added to account for the 5% discount provided to residential customers under
17 DEP's SC Residential Service Energy Conservation Discount Rider RECD-2C.

18 **Q. WHY DOES DEP PROPOSE INCLUSION OF THE EFFECTS OF RIDER**
19 **RECD-2C?**

20 A. The Company should not reflect fuel revenue collections for 100% of its fuel
21 billings while simultaneously providing a 5% discount on the total bill as required
22 by Rider RECD-2C. As shown on McGee Exhibit No.6, this discount impacts
23 approximately 15% of DEP's South Carolina residential sales. The Company's

1 request in this proceeding is consistent with this Commission's Orders issued in
2 all of DEP's fuel proceedings since 2009.

3 **Q. DO YOU BELIEVE DEP'S ACTUAL FUEL COSTS INCURRED DURING**
4 **THE PERIOD WERE REASONABLE?**

5 A. Yes. I believe the costs were reasonable and that DEP has demonstrated that it
6 met the criteria set forth in § 58-27-865(F) of the Code. These costs also reflect
7 DEP's continuing efforts to maintain reliable service and an economical
8 generation mix, thereby minimizing the total cost of providing service to DEP's
9 South Carolina retail customers.

10 **Q. HOW ARE MERGER FUEL-RELATED SAVINGS HANDLED IN DEP'S**
11 **RECOMMENDED FUEL RATES?**

12 A. As Company witness Weintraub states in his testimony, merger fuel-related
13 savings automatically flow through to DEP's retail customers through the fuel and
14 fuel-related cost component of customers' rates. Actual merger savings during
15 the review period are included in the true-up portion of the proposed fuel and
16 fuel-related cost factors. In addition, in the prospective component of the factors,
17 the projected merger savings related to procuring coal and reagents, lower
18 transportation costs, lower gas capacity costs, and coal blending are reflected in
19 the cost of fossil fuel. Projected joint dispatch savings, which are the result of
20 using the combined systems' lowest cost available generation to meet total
21 customer demand, are also reflected in the cost of fossil fuel, as well as the
22 projected cost purchases and sales that include the purchases and sales between

DEP and DEC. Actual and projected savings related to the procurement of nuclear fuel are reflected in the cost of nuclear fuel.

Q. WHAT IS THE IMPACT TO CUSTOMERS' BILLS IF THE PROPOSED FUEL AND FUEL-RELATED COST FACTORS ARE APPROVED BY THE COMMISSION?

A. The impact of the proposed fuel rate increase for an average residential customer using 1000 kWh per month is an increase of \$0.35, or 0.3%. Impacts for commercial and industrial customers vary by customer, but are approximately 0.6% and 0.8%, respectively.

	Residential	General Service Non-Demand	General Service Demand ⁽¹⁾	Lighting
Proposed Total Fuel Factor in ¢/kWh	3.023	2.997	2.958	2.958
Existing Total Fuel Factor in ¢/kWh	2.988	2.957	2.910	2.910
⁽¹⁾ The environmental rate for these customers is 14 ¢/kW				

Q. WHAT ARE THE KEY DRIVERS IMPACTING THE PROPOSED FUEL FACTOR?

A. A number of factors contribute to the increase in the proposed total fuel cost factors for all customer classes. Total fuel costs projected for the billing period, including environmental, are declining primarily due to lower coal prices, as well as the expected suspension of the U.S. Department of Energy ("DOE") nuclear waste disposal fees beginning in May 2014, as discussed in Company witness Church's testimony. This decline is offset by a \$19.6 million under-collection of fuel costs. This large under-collection was primarily due to the extreme weather conditions experienced in January 2014 during the Polar Vortex which led to higher fuel costs. The resulting increased usage required more frequent operation

1 of DEP's higher cost generating units as well as an increase in purchases of power
2 at higher costs. The high demand across the country for electricity led to
3 increases in prices which had a significant impact on DEP since the majority of its
4 generation consists of gas-fired generation. The fuel rate increase experienced
5 during this time would have been higher had it not been for the ability of the
6 Company to leverage its diverse generating resources and utilize the benefits of
7 joint dispatch from the combined portfolio of DEP's and DEC's resources.

8 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

9 **A.** Yes, it does.

DUKE ENERGY PROGRESS, INC.
SOUTH CAROLINA RETAIL FUEL CASE
CALCULATION OF TOTAL FUEL COMPONENT
BILLING PERIOD JULY 31, 2014 TO JUNE 30, 2015

Line No.	Description	Reference	Customer Class			
			Cents / kWh		General Service (demand)	
			Residential	General Service (non demand)	Lighting	General Service (demand)
Base Fuel Costs						
1	Base Fuel Cost Component Under / (Over) Collection at June 2014	Exhibit 2	0.304	0.304	0.304	0.304
2	Base Fuel Cost Component Projected Billing Period	Exhibit 3	2.654	2.654	2.654	2.654
3	Total Base Fuel Cost Component	Line 1 + Line 2	2.958 [1]	2.958	2.958	2.958
4	Total Base Fuel Cost Component Increased for RECD	Line 3 * RECD factor	2.981			
Environmental Costs						
5	Environmental Component Under / (Over) Collection at June 2014	Exhibit 4 Page 1.3	(0.016)	(0.013)	N/A	(1)
6	Environmental Component Projected Billing Period	Exhibit 5	0.058	0.052	N/A	15
7	Total Environmental Component	Line 5 + 6	0.042 [1]	0.039	N/A	14 [2]
8	Total Environmental Cost Component Increased for RECD	Line 7 * RECD factor	0.042			
9	Total Fuel Cost Factor	Sum Total Base Fuel + Total Environmental	3.023	2.997	2.958	2.958

Notes:

[1] RECD factor is .7683% and is calculated on Exhibit 6

[2] The environmental rate for these customers is 14 cents per kW as calculated on exhibits 4 & 5

DUNE ENERGY PROGRESS, INC.
SOUTH CAROLINA RETAIL FUEL CASE
CALCULATION OF BASE FUEL OVER / (UNDER) RECOVERY
ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2014

Line No.	Description	Reference	Review Period March 2013	Review Period April 2013	Review Period May 2013	Review Period June 2013	Review Period July 2013	Review Period August 2013
1	Coal		59,023,496	43,097,099	39,384,307	68,394,024	74,721,746	71,474,074
2	Gas		44,913,344	47,453,872	55,019,111	56,372,613	62,313,254	61,293,186
3	Nuclear Fuel		12,195,452	11,542,621	10,962,560	16,348,648	18,488,895	15,487,581
4	Purchased Power		40,417,205	16,895,548	27,855,841	21,117,995	27,227,787	29,594,211
5	Fuel Expense Recovered Through Intersystem Sales		(11,622,242)	(15,683,919)	(11,760,294)	(21,139,093)	(24,065,728)	(27,637,522)
6	Total Fuel Costs	Sum Lines 1 through 5	144,976,665	103,305,589	121,471,765	137,487,199	156,547,934	150,608,530
7	Total System RWH Sales		4,396,486,286	4,256,166,018	3,849,422,774	4,297,511,033	5,050,038,599	5,246,619,945
8	Fuel Costs Incurred c/w/h	Line 6 / Line 7 * 100	3.296	2.427	3.156	3.203	3.100	2.871
9	Fuel Costs Billed c/w/h	Line 6 / Line 7 * 100	3.629	2.628	2.628	2.636	2.910	2.910
10	SC Retail Sales RWH	474,712,340	554,895,417	452,740,195	466,779,249	602,531,741	613,182,765	241,704
11	Over / (Under) Current Month	(Line 9 - Line 8) * Line 10 / 100	(3,168,523)	1,114,187	(2,388,586)	(2,646,429)	(1,144,423)	
12	Over / (Under) Cumulative Balance - February 2013	Prior Annual Filing	895,513					
13	Accounting Adjustment(s)							
14	Over / (Under) Cumulative Balance	Prior Mo Cum Bal + Line 11 - Line 13	(12,272,815)	(1,158,628)	(3,547,214)	(6,139,643)	(7,338,066)	(7,096,362)
Line No.	Class	Reference	Review Period September 2013	Review Period October 2013	Review Period November 2013	Review Period December 2013	Review Period January 2014	Review Period February 2014
15	Coal		50,937,244	36,588,724	48,338,863	39,417,046	64,711,988	72,722,487
16	Gas		56,429,193	57,822,803	65,746,673	70,265,959	160,456,870	140,180,661
17	Nuclear Fuel		13,579,070	11,895,873	15,333,995	16,231,806	14,943,059	16,560,831
18	Purchased Power		20,695,746	18,165,617	25,578,317	22,340,333	87,648,010	33,010,235
19	Fuel Expense Recovered Through Intersystem Sales		(16,344,063)	(14,164,285)	(15,633,999)	(22,655,629)	(46,021,139)	(22,880,381)
20	Total Fuel Costs	Sum Lines 15 through 19	127,292,860	110,991,886	135,975,727	125,091,698	283,425,481	141,995,404
21	Total System RWH Sales		4,425,821,775	4,051,650,575	3,941,130,262	4,605,941,096	5,389,113,675	4,912,803,218
22	Fuel Costs Incurred c/w/h	Line 20 / Line 21 * 100	2.876	2.739	3.449	2.716	5.239	2.890
23	Fuel Costs Billed c/w/h	Line 20 / Line 21 * 100	2.910	2.910	2.910	2.911	2.911	2.824
24	SC Retail Sales RWH		518,884,686	500,618,394	468,689,255	468,489,160	612,208,970	570,386,942
25	Over / (Under) Recovered Current Month	(Line 23 - Line 22) * Line 24 / 100	189,743	833,920	(2,525,777)	972,667	(14,376,029)	111,995
26	Accounting Adjustment(s)							
27	Over / (Under) Recovered Cumulative Balance	Prior Mo Cum Bal + Line 25 - Line 26	(6,720,858)	(3,853,664)	(8,379,440)	(7,406,774)	(21,782,803)	(21,567,436)
Line No.	Class	Reference	Review Period March 2014	Review Period April 2014	Review Period May 2014	Review Period June 2014	Review Period July 2014	Review Period August 2014
28	Coal		65,498,436	18,148,826	29,364,590	50,327,753		
29	Gas		70,681,262	64,052,010	56,659,755	72,083,058		
30	Nuclear Fuel		11,679,348	12,483,177	13,824,784	13,688,568		
31	Purchased Power		40,484,955	16,488,297	20,358,001	25,646,613		
32	Fuel Expense Recovered Through Intersystem Sales		(12,939,815)	(15,265,558)	(11,093,071)	(23,088,879)		
33	Total Fuel Costs	Sum Lines 28 - 32	170,354,186	95,906,751	103,164,053	128,657,113		
34	Total System RWH Sales		4,396,971,975	3,684,122,704	4,236,064,443	4,858,782,381		
35	Fuel Costs Incurred c/w/h	Line 33 / Line 34 * 100	3.874	2.603	2.435	2.648		
36	Fuel Costs Billed c/w/h		2.911	2.911	2.911	2.911		
37	SC Retail Sales RWH		512,144,615	450,967,276	509,440,381	559,031,474		
38	Over / (Under) Recovered Current Month	(Line 36 - Line 35) * Line 37 / 100	(4,935,764)	1,386,106	2,421,025	1,468,459		
39	Accounting Adjustment(s)		1,673,235					
40	Over / (Under) Recovered Cumulative Balance	Prior Mo Cum Bal + Line 38 + Line 39	(24,879,945)	(23,443,839)	(21,072,814)	(19,554,355)		
41	SC Projected SC Retail Sales July 2014 - June 2015						6,440,566,739	
42	SC Base Fuel Increment / (Decrement) Calculated Base (cents / MWh)						0.304	c/MWh
Line 40 / Line 41 * 100								

DUKE ENERGY PROGRESS, INC.
SOUTH CAROLINA RETAIL FUEL CASE
PROJECTED BILLING PERIOD BASE FUEL COSTS
FOR THE 12 MONTHS ENDING JULY 31, 2014 TO JUNE 30, 2015

McGee Exhibit 3
DOCKET NO 2014-1-E

Line No.	Description	Reference	July 2014	August 2014	September 2014	October 2014	November 2014	December 2014	12 Month Total
1	Coal		\$ 63,804,808	\$ 50,232,382	\$ 42,746,498	\$ 23,215,817	\$ 26,932,561	\$ 56,154,626	
2	Gas		78,215,713	\$ 77,494,462	\$ 62,514,776	\$ 51,316,987	\$ 50,412,503	\$ 41,792,997	
3	Nuclear Fuel		14,507,240	14,507,240	13,356,909	14,156,344	14,543,986	13,984,620	
4	Purchased Power		29,435,720	27,735,322	21,673,592	19,759,037	16,321,210	22,305,840	
5	Fuel Expense Recovered Through Intersystem Sales		(36,871,717)	(34,087,361)	(17,389,093)	(15,183,619)	(17,166,624)	(7,464,678)	
6	Total Fuel Costs	Sum Lines 1 through 5	\$ 149,091,763	135,882,044	122,902,680	93,264,566	91,043,636	126,773,405	
7	Projected Total System Sales from July 14 - June 15 kWh		5,505,904,133	5,163,088,819	4,657,955,526	3,916,946,610	3,937,838,616	4,937,271,337	
8	System Cost per kWh (¢/kwh)	Line 6 / Line 7 * 100	2.708	2.632	2.639	2.381	2.312	2.568	
9	Projected SC Retail Sales July 14 - June 15 kWh		646,242,413	581,120,628	559,168,065	479,874,821	470,781,977	545,893,455	
10	SC Base Fuel Costs	Line 8 * Line 9 / 100	\$ 17,499,291	\$ 15,293,918	\$ 14,753,952	\$ 11,426,073	\$ 10,884,576	\$ 14,016,806	
11	Coal		\$ 71,291,200	\$ 60,710,507	\$ 20,605,208	\$ 33,492,745	\$ 37,325,550	\$ 46,461,136	532,973,040
12	Gas		40,269,831	39,443,029	72,137,007	57,420,931	65,722,573	67,775,655	704,516,463
13	Nuclear Fuel		14,316,360	12,715,095	11,369,547	9,648,659	10,046,068	14,116,763	157,268,831
14	Purchased Power		25,115,861	17,487,521	21,854,655	20,162,829	23,386,989	25,387,617	270,626,192
15	Fuel Expense Recovered Through Intersystem Sales		(10,856,751)	(12,279,392)	(10,199,859)	(11,902,492)	(13,929,560)	(20,425,927)	(207,757,074)
16	Total Fuel Costs	Sum Lines 11 through 15	140,136,502	118,076,760	115,766,558	108,822,672	122,551,621	133,315,244	1,457,627,451
17	Projected Total System Sales from July 14 - June 15 kWh		5,166,274,277	4,405,507,870	4,213,562,874	3,854,463,212	4,240,192,249	4,925,714,406	54,924,719,930
18	System Cost per kWh (¢/kwh)	Line 16 / Line 17 * 100	2.713	2.680	2.747	2.823	2.890	2.707	2.654
19	Projected SC Retail Sales July 14 - June 15		609,059,628	499,292,692	484,622,017	477,209,709	508,652,370	579,050,964	6,440,968,739
20	SC Base Fuel Costs	Line 18 * Line 19 / 100	\$ 16,520,897	\$ 13,382,081	\$ 13,314,865	\$ 13,473,014	\$ 14,701,261	\$ 15,672,107	170,943,310

DUKIE ENERGY PROGRESS, INC.
 SOUTH CAROLINA RETAIL FUEL CASE
 CALCULATION OF ENVIRONMENTAL OVER / (UNDER) RECOVERY
 ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2014

Line No.	CP %	Residential	45.85%	Review Period March 2013	Review Period April 2013	Review Period May 2013	Review Period June 2013	Review Period July 2013	Review Period August 2013
1		Summer 2013 From Confidential Peak (CP) 1W							
2									
3		Total Revenues		1,200,497 \$	1,304,694 \$	1,079,229 \$	1,417,344 \$	1,516,731 \$	1,583,076 \$
4		Emulsion Additives		33,524	33,003	54,244	92,491	110,320	106,829
5		Off-System Sales		(6,670)	(193,823)	(73,414)	(3,301,019)	(277,483)	(407,231)
6		Net Environmental Costs		1,253,311 \$	987,869 \$	1,064,059 \$	1,579,816 \$	1,279,566 \$	1,686,632 \$
7		Total System Sales 1W		4,386,496,865	4,356,166,018	3,849,422,774	4,293,211,031	5,094,028,599	5,246,619,945
8		Environmental System Costs Incurred (C/wh)		0.0280	0.0232	0.0176	0.0568	0.0346	0.0321
9		SC Retail Sales 1W		474,712,540	554,893,417	452,740,595	466,779,249	602,531,741	613,182,789
10		SC Environmental Costs		112,735 \$	218,780 \$	125,144 \$	171,793 \$	208,745 \$	157,120
11		Residential Environmental Cost Allocated by Firm CP		60,877 \$	59,087 \$	57,395 \$	78,790 \$	95,737 \$	90,405
12		SC Residential 1W Sales		202,592,346	171,597,631	123,298,278	156,897,537	312,885,791	208,064,269
13		SC Residential Environmental Costs Incurred (C/wh)		0.090	0.094	0.047	0.050	0.052	0.043
14		SC Residential Environmental Costs (Billed C/wh)		0.050	0.050	0.050	0.050	0.054	0.054
15		SC Residential Environmental Costs Over / (Under) Recovery		40,992 \$	27,202 \$	4,254 \$	(341) \$	3,021 \$	21,549
16		Over / (Under) Cumulative Balance - February 2013		158,665					
17		Cumulative SC Residential Environmental Costs Over / (Under) Recovery		199,257 \$	278,459 \$	290,713 \$	290,372 \$	233,393 \$	235,342
18		Total Revenues		1,471,482 \$	1,377,027 \$	1,287,498 \$	883,979 \$	2,280,309 \$	2,084,195 \$
19		Emulsion Additives		64,784	40,880	44,801	33,739	33,618	41,272 \$
20		Off-System Sales		(72,153)	(206,317)	(188,489)	(301,157)	(195,982)	(2,887,927)
21		Net Environmental Costs		1,264,073 \$	1,161,570 \$	1,152,710 \$	596,561 \$	2,206,865 \$	1,978,595 \$
22		Total System Sales		4,435,821,775	4,091,610,579	3,941,130,182	4,605,541,090	5,380,113,675	4,612,803,218 \$
23		Environmental System Costs Incurred (C/wh)		0.0335	0.0287	0.0445	0.0710	0.0410	0.0402
24		SC Retail Sales 1W		513,499,645	502,518,134	446,899,235	499,489,180	611,206,970	570,358,942 \$
25		SC Environmental Costs		174,040 \$	243,514 \$	208,437 \$	64,564 \$	250,929 \$	779,488 \$
26		Residential Environmental Cost Allocated by Firm CP		79,420 \$	63,822 \$	93,596 \$	29,811 \$	115,084 \$	105,150 \$
27		SC Residential 1W Sales		183,602,066	130,378,963	140,750,224	201,523,601	254,869,724	242,361,902
28		SC Residential Environmental Costs Incurred (C/wh)		0.049	0.046	0.068	0.075	0.045	0.043
29		SC Residential Environmental Costs (Billed C/wh)		0.054	0.054	0.054	0.054	0.054	0.054
30		SC Residential Environmental Costs Over / (Under) Recovery		8,201 \$	8,446 \$	(19,591) \$	79,265 \$	22,545 \$	75,625 \$
31		Cumulative SC Residential Environmental Costs Over / (Under) Recovery		263,543 \$	272,389 \$	232,799 \$	332,064 \$	354,610 \$	380,715 \$
32		Total Revenues		2,529,136 \$	973,971 \$	1,384,335 \$	2,182,981		
33		Emulsion Additives		36,648	17,590	34,795	68,223		
34		Off-System Sales		(68,558)	(15,578)	(12,001)	(8,632)		
35		Net Environmental Costs		2,510,696 \$	985,945 \$	1,400,150 \$	2,219,546		
36		Total System Sales		4,236,071,975	3,684,122,704	4,236,064,441	4,058,782,381		
37		Environmental System Costs Incurred (C/wh)		0.0971	0.0584	0.0532	0.0487		
38		SC Retail Sales 1W		512,146,615	480,987,278	509,440,532	\$59,091,423		
39		SC Environmental Costs		174,040 \$	243,514 \$	208,437 \$	64,564 \$		
40		Residential Environmental Cost Allocated by Firm CP		79,420 \$	63,822 \$	93,596 \$	29,811 \$		
41		SC Residential 1W Sales		187,463,878	117,512,249	128,656,032	198,599,042		
42		SC Residential Environmental Costs Incurred (C/wh)		0.072	0.047	0.060	0.069		
43		SC Residential Environmental Costs (Billed C/wh)		0.054	0.054	0.054	0.054		
44		SC Residential Environmental Costs Over / (Under) Recovery		(12,889) \$	8,112 \$	(4,200) \$	(9,878)		
45		Cumulative SC Residential Environmental Costs Over / (Under) Recovery		347,346 \$	335,458 \$	347,358 \$	337,380		
46		SC Residential Environmental Costs July 2014 - June 2015					2,137,377,003		
47		SC Residential Environmental Costs Over / (Under) Cumulative Balance (C/wh)		(Line 45 / Line 46) * 100			(100.15)		

DUKE ENERGY PROGRESS, INC.
SOUTH CAROLINA RETAIL RATE CASE
CALCULATION OF ENVIRONMENTAL OVER / (UNDER) RECOVERY
ACTUAL AND ESTIMATED COSTS AND REVENUES: MARCH 2013 - JUNE 2014
General Service (non-demand)

Line No.	Description	CP %	Revenue Period March 2013	Revenue Period April 2013	Revenue Period May 2013	Revenue Period June 2013	Revenue Period July 2013	Revenue Period August 2013
1	Total Request		1,200,407 \$	1,130,674 \$	1,079,279 \$	1,317,346 \$	1,515,731 \$	1,583,076 \$
2	Enrollment Allowances		33,524	33,003	58,234	92,491	110,320	105,329
3	Off-System Sales		14,620	(129,878)	(73,424)	(130,019)	(127,483)	(1,402,771)
4	Net Environmental Costs		1,229,311 \$	987,809 \$	1,006,079 \$	1,579,856 \$	1,799,568 \$	1,686,122 \$
5	Total System Sales 1/Wh		4,396,488,985	4,256,166,018	3,849,412,774	4,292,511,073	5,090,038,599	5,246,619,945
6	Environmental System Costs Incurred C/Wh		0.028	0.023	0.028	0.037	0.032	0.032
7	SC Retail Sales 1/Wh		474,712,900	554,895,417	482,740,595	486,779,269	602,211,741	611,182,768
8	SC Environmental Costs		132,725 \$	128,720 \$	125,144 \$	171,793 \$	208,745 \$	197,720 \$
9	General Service (non-demand) Environmental Costs Allocated by Firm CP		7,746 \$	7,516 \$	7,305 \$	10,026 \$	12,182 \$	11,504 \$
10	SC General Service (non-demand) Environmental Costs Incurred C/Wh		23,988,140	22,673,744	19,918,092	24,527,376	26,945,883	31,206,540
11	SC General Service (non-demand) Environmental Costs Allocated by Firm CP		0.072	0.033	0.037	0.041	0.045	0.037
12	SC General Service (non-demand) Environmental Costs Incurred C/Wh		0.050	0.050	0.050	0.050	0.047	0.047
13	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery		4,238 \$	3,821 \$	2,685 \$	2,238 \$	483 \$	3,153 \$
14	Over / (Under) Cumulative Balance - February 2013		19,849	27,906 \$	30,593 \$	32,831 \$	33,314 \$	35,478 \$
15	Cumulative SC General Service (non-demand) Environmental Costs Over / (Under) Recovery		24,087 \$					
16								
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Line No.	Description	Revenue Period September 2013	Revenue Period October 2013	Revenue Period November 2013	Revenue Period December 2013	Revenue Period January 2014	Revenue Period February 2014	Revenue Period Twelve Months Ended Feb 2014
18	Total Request	1,471,887 \$	1,327,027 \$	1,892,498 \$	863,979 \$	2,280,309 \$	2,096,195 \$	19,019,331
19	Enrollment Allowances	84,764	40,860	48,801	33,739	33,618	47,272	742,455
20	Off-System Sales	(72,153)	(206,317)	(182,589)	(150,157)	(105,062)	(116,871)	(2,283,797)
21	Net Environmental Costs	1,484,473 \$	1,160,570 \$	1,758,710 \$	586,561 \$	2,208,865 \$	1,976,595 \$	17,477,989
22	Total System Sales	4,425,821,775	4,091,670,579	3,941,130,282	4,095,941,090	5,389,113,675	4,912,380,218	54,417,675,954
23	Environmental System Costs Incurred C/Wh	0.034	0.029	0.041	0.013	0.040	0.040	0.040
24	SC Retail Sales 1/Wh	518,884,666	590,618,134	489,489,255	498,489,180	612,208,970	570,388,941	6,394,112,058
25	SC Environmental Costs	171,040 \$	143,524 \$	708,437 \$	64,564 \$	250,929 \$	279,488 \$	2,055,310
26	General Service (non-demand) Environmental Costs Allocated by Firm CP	10,157 \$	8,376 \$	12,164 \$	3,768 \$	14,644 \$	13,393 \$	11,878
27	SC General Service (non-demand) Environmental Costs Incurred C/Wh	26,535,195	23,573,217	20,816,438	25,065,348	28,881,403	26,446,511	300,718,877
28	SC General Service (non-demand) Environmental Costs Allocated by Firm CP	0.038	0.016	0.058	0.015	0.051	0.051	0.049
29	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	0.047	0.047	0.047	0.047	0.047	0.047	0.048
30	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	2,315 \$	2,704 \$	(2,380) \$	8,073 \$	(1,023) \$	(963) \$	23,394
31	Cumulative SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	38,793 \$	41,706 \$	39,116 \$	47,129 \$	46,106 \$	45,143 \$	45,143
32								
33								
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Line No.	Description	Estimated March 2014	Estimated April 2014	Estimated May 2014	Estimated June 2014
32	Total Request	2,529,136 \$	973,971 \$	1,184,355 \$	2,162,961
33	Enrollment Allowances	50,080	17,590	34,395	66,722
34	Off-System Sales	(6,454)	(5,795)	(12,401)	(9,688)
35	Net Environmental Costs	2,510,666 \$	988,545 \$	1,408,150 \$	2,215,516
36	Total System Sales	4,296,971,975	3,884,122,704	4,236,004,443	4,884,782,181
37	Environmental System Costs Incurred C/Wh	0.057	0.027	0.033	0.046
38	SC Retail Sales 1/Wh	512,144,615	450,967,276	509,440,381	555,031,474
39	SC Environmental Costs	282,434 \$	120,688 \$	189,348 \$	255,372
40	General Service (non-demand) Environmental Costs Allocated by Firm CP	17,066 \$	7,043 \$	9,883 \$	14,903
41	SC General Service (non-demand) Environmental Costs Incurred C/Wh	22,137,594	19,407,747	22,877,068	26,046,745
42	SC General Service (non-demand) Environmental Costs Allocated by Firm CP	0.077	0.036	0.043	0.057
43	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	0.047	0.047	0.047	0.047
44	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	(6,660) \$	2,078 \$	889 \$	(2,441)
45	Cumulative SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	38,475 \$	40,554 \$	41,423 \$	38,782
46	SC Projected General Service (non-demand) Sales July 2014 - June 2015				300,736,591
47	SC General Service (non-demand) Environmental Recoveries / (Decreases) Calculated Rate (C/Wh)	-Line 45 / Line 46 * 100			(0.013)

Line Item	Summer 2013 Firm Commitment Peak (CPI Levels)	General Service (Demand)	CP %	48 10%	Reference	Review Period	Review Period	Review Period	Review Period	Review Period	Review Period		
						March 2013	April 2013	May 2013	June 2013	July 2013	August 2013		
1	Total Revenues	5	1,220,407	5	1,220,407	5	1,079,279	5	1,817,344	5	1,916,131	5	1,988,076
2	Evolution Allocations	5	31,524	5	31,524	5	54,234	5	92,491	5	110,120	5	105,439
3	CPI System Sales	5	14,620	5	14,620	5	19,848	5	73,434	5	130,019	5	142,723
4	Net Environmental Costs	5	1,279,319	5	987,899	5	1,065,039	5	1,579,816	5	1,779,584	5	1,868,687
5	Total System Sales (VW)	7	6,396,486	9	4,256,165	6,018	3,849,412	7,74	4,291,515	9,013	5,050,038	9,99	5,246,619
6	Environmental System Costs Incurred (CPI)	9	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038	0.038
7	SC Digital Sales (VW)	9	419,713	4,940	554,893	4,74	482,740	5,49	444,799	4,49	602,511	4,41	611,342
8	SC Environmental Costs	10	116,725	5	124,790	5	125,144	5	172,599	5	208,120	5	197,120
9	General Service (Demand)	11	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
10	General Service (Demand)	12	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
11	General Service (Demand)	13	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
12	General Service (Demand)	14	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
13	General Service (Demand)	15	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
14	General Service (Demand)	16	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
15	General Service (Demand)	17	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
16	General Service (Demand)	18	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
17	General Service (Demand)	19	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
18	General Service (Demand)	20	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
19	General Service (Demand)	21	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
20	General Service (Demand)	22	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
21	General Service (Demand)	23	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
22	General Service (Demand)	24	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
23	General Service (Demand)	25	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
24	General Service (Demand)	26	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
25	General Service (Demand)	27	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
26	General Service (Demand)	28	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
27	General Service (Demand)	29	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
28	General Service (Demand)	30	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
29	General Service (Demand)	31	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
30	General Service (Demand)	32	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
31	General Service (Demand)	33	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
32	General Service (Demand)	34	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
33	General Service (Demand)	35	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
34	General Service (Demand)	36	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
35	General Service (Demand)	37	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
36	General Service (Demand)	38	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
37	General Service (Demand)	39	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
38	General Service (Demand)	40	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
39	General Service (Demand)	41	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
40	General Service (Demand)	42	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
41	General Service (Demand)	43	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
42	General Service (Demand)	44	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
43	General Service (Demand)	45	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
44	General Service (Demand)	46	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
45	General Service (Demand)	47	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
46	General Service (Demand)	48	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
47	General Service (Demand)	49	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
48	General Service (Demand)	50	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
49	General Service (Demand)	51	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
50	General Service (Demand)	52	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
51	General Service (Demand)	53	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
52	General Service (Demand)	54	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
53	General Service (Demand)	55	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
54	General Service (Demand)	56	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
55	General Service (Demand)	57	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
56	General Service (Demand)	58	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
57	General Service (Demand)	59	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
58	General Service (Demand)	60	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
59	General Service (Demand)	61	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
60	General Service (Demand)	62	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
61	General Service (Demand)	63	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
62	General Service (Demand)	64	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
63	General Service (Demand)	65	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
64	General Service (Demand)	66	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
65	General Service (Demand)	67	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
66	General Service (Demand)	68	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
67	General Service (Demand)	69	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
68	General Service (Demand)	70	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
69	General Service (Demand)	71	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
70	General Service (Demand)	72	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
71	General Service (Demand)	73	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
72	General Service (Demand)	74	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
73	General Service (Demand)	75	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
74	General Service (Demand)	76	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
75	General Service (Demand)	77	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
76	General Service (Demand)	78	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
77	General Service (Demand)	79	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
78	General Service (Demand)	80	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
79	General Service (Demand)	81	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
80	General Service (Demand)	82	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
81	General Service (Demand)	83	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
82	General Service (Demand)	84	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
83	General Service (Demand)	85	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
84	General Service (Demand)	86	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
85	General Service (Demand)	87	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
86	General Service (Demand)	88	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
87	General Service (Demand)	89	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
88	General Service (Demand)	90	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
89	General Service (Demand)	91	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
90	General Service (Demand)	92	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
91	General Service (Demand)	93	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
92	General Service (Demand)	94	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
93	General Service (Demand)	95	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
94	General Service (Demand)	96	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
95	General Service (Demand)	97	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
96	General Service (Demand)	98	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
97	General Service (Demand)	99	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
98	General Service (Demand)	100	64,113	5	64,207	5	64,207	5	64,207	5	64,207	5	64,207
99	General Service (Demand)	101	64,										

[illegible]

Line No.	Description	Reference		Estimated	Estimated	Estimated	Estimated	
		2014	2015	2014	2015	2014	2015	
32	Total Reagents			\$ 2,579,138	\$	973,972	\$ 1,364,935	\$ 2,162,961
33	Enzymatic Reagents			\$ 502,688		17,250	\$ 36,395	\$ 66,123
34	PCR System Reagents			\$ 13,540		13,540	\$ 13,540	\$ 13,540
35	Net Environmental Costs			\$ 23,104,069		997,345	\$ 1,508,156	\$ 2,119,546
36	Total System Sales With							
37	Environmental System Costs Incurred / With							
38	SC Regional Sales With							
39	SC Environmental Costs							
40	General Service (Internal) Environmental Cost Allocated by Firm CP							
41	General Service (Internal) Env Sales							
42	SC General Service (Internal) Environmental Costs Incurred C / NW							
43	SC General Service (Internal) Environmental Costs Shared C / NW							
44	SC General Service (Internal) Environmental Costs Over / (Under) Recovery							
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McGee Exhibit 5
DOCKET NO 2014-1-E

Line No.	Description	Reference
		July 2014
		August 2014
		September 2014
		October 2014
		November 2014
		December 2014

[illegible]

20	SC Environmental Costs Allocated on CP kWhs				
21	Residential	Total Line 19 * Line 1		\$	1,239,862
22	General Service (non demand)	Total Line 19 * Line 2			137,767
23	General Service (demand)	Total Line 19 * Line 3			1,305,766
	Total SC	Sum Lines 20 through 22		\$	2,703,396
24	Projected Retail Sales kWh				
25	Residential				2,137,377,003
26	General Service (non demand)				301,500,320
27	General Service (demand)				3,898,612,603
28	Lighting				103,178,814
	Total SC	Sum Lines 24 through 27			6,440,968,739
29	Projected Average Environmental Fuel Cost c/kWh				
30	Residential	Line 20 / Line 24 * 100		0.058	
	General Service (non demand)	Line 21 / Line 25 * 100		0.052	
31	Projected Average Environmental Fuel Cost c/kWh				
32	Projected SC MW sales (General Service (demand)				8,440,978
	General Service (demand)	Line 22 / Line 31 * 100		15	c/NW

DUKE ENERGY PROGRESS, INC.
SOUTH CAROLINA RETAIL FUEL CASE
REVENUE ADJUSTMENT FACTOR FOR RECD
FOR THE 12 MONTHS ENDING MARCH 31, 2013 TO FEBRUARY 28, 2014

Residential Adjustment Factor

(1) Billed kWh (12ME 2/28/14)	Per Books	2,215,371,902	
(2) Billed RECD kWh (12ME 2/28/14)		<u>340,414,857</u>	(a)
(3) RECD kWh Percent of Total Billed	Line 2 / Line 1	15.3660%	
(4) RECD Discount	RECD Discount	<u>5.0000%</u>	(b)
(5) RECD Impact (Weighted Discount)	Line 3 X Line 4	0.7683%	

Notes:

- (a) Energy billed and discounted pursuant to Residential Energy Conservation Discount, Rider RECD-2C.
- (b) Five-percent discount provided under Residential Energy Conservation Discount, Rider RECD-2C.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-1-E**

In the Matter of)	DIRECT TESTIMONY OF
Annual Review of Base Rates)	JOSEPH A. MILLER, JR. FOR
for Fuel Costs for)	DUKE ENERGY PROGRESS, INC.
Duke Energy Progress, Inc.)	

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Joseph A. Miller, Jr. and my business address is 526 South Church
3 Street, Charlotte, North Carolina 28202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am interim Vice President of Central Engineering and Services for Duke Energy
6 Business Services, LLC, which is a service company subsidiary of Duke Energy
7 Corporation ("Duke Energy") that provides services to Duke Energy and its
8 subsidiaries, including Duke Energy Progress, Inc. ("DEP" or the "Company") and
9 Duke Energy Carolinas, LLC ("DEC").

10 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND**
11 **PROFESSIONAL BACKGROUND.**

12 A. I graduated from Purdue University with a Bachelor of Science degree in
13 mechanical engineering. I also completed twelve post graduate level courses in
14 Business Administration at Indiana State University. My career began with Duke
15 Energy (d/b/a Public Service of Indiana) in 1991 as a staff engineer at Duke Energy
16 Indiana's Cayuga Steam Station. Since that time, I have held various roles of
17 increasing responsibility in the generation engineering, maintenance, and operations
18 areas, including the role of station manager, first at Duke Energy Kentucky's East
19 Bend Steam Station, followed by Duke Energy Ohio's Zimmer Steam Station. I was
20 named General Manager of Analytical and Investments Engineering in 2010, and
21 was named General Manager of Strategic Engineering in July 2012 following the
22 merger between Duke Energy and Progress Energy, Inc. I was named interim Vice
23 President of Central Engineering and Services in February 2014.

1 **Q. WHAT ARE YOUR DUTIES AS VICE PRESIDENT OF CENTRAL**
2 **ENGINEERING AND SERVICES?**

3 A. In this role, I am responsible for providing direction and oversight for engineering
4 and business services including design, standards, and consulting along with
5 strategic services, technical services such as NERC compliance, and environmental
6 compliance for DEP's fleet of fossil and hydroelectric ("hydro" and collectively,
7 "fossil/hydro") facilities.

8 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**
9 **PROCEEDINGS?**

10 A. Yes. I testified before Public Service Commission of South Carolina in DEP's 2013
11 annual fuel proceeding in Docket No. 2013-1-E, as well as in DEC's 2012 and 2013
12 annual fuel proceedings in Docket Nos. 2012-3-E and 2013-3-E, respectively. I
13 have also testified on multiple occasions on behalf of Duke Energy in proceedings
14 before this and other state commissions.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
16 **PROCEEDING?**

17 A. The purpose of my testimony is to (1) describe DEP's generation portfolio and
18 changes made since the prior year's filing, (2) discuss the performance of DEP's
19 fossil/hydro facilities during the period of March 1, 2013 through February 28, 2014
20 (the "review period"), (3) provide information on significant outages that occurred
21 during the review period, and (4) discuss DEP's environmental compliance efforts.

1 Q. PLEASE DESCRIBE DEP'S FOSSIL/HYDRO GENERATION
2 PORTFOLIO.

3 A. The Company's fossil/hydro generation portfolio consists of 9,175¹ megawatts
4 ("MWs") of generating capacity, made up as follows:

5	Coal-fired ² -	3,328 MWs
6	Combustion Turbines -	2,999 MWs
7	Combined Cycle Turbines -	2,626 MWs
8	Hydro -	222 MWs

9 The 3,328 MWs of coal-fired generation represent three generating stations
10 and a total of seven units. These units are equipped with emission control
11 equipment, including selective catalytic reduction ("SCR") equipment for removing
12 nitrogen oxides ("NO_x"), flue gas desulfurization ("FGD" or "scrubber") equipment
13 for removing sulfur dioxide ("SO₂"), and low NO_x burners. This inventory of coal-
14 fired assets with emission control equipment employed enhances DEP's ability to
15 maintain current environmental compliance and concurrently utilize coal with
16 increased sulfur content – providing flexibility for DEP to procure the best cost
17 options for coal supply.

18 The Company has a total of 36 simple cycle combustion turbine ("CT")
19 units, the larger 14 of which provide 2,205 MWs, or 73.5% of capacity. These 14
20 units are located at the Asheville, Darlington, Richmond County, and Wayne County
21 facilities, and are equipped with water injection and/or low NO_x burners for NO_x
22 control. The 2,626 MWs shown as "Combined Cycle Turbines" ("CC") represent

¹ As of 3/17/2014 representing DEP's ownership share.

² Represents DEP's 83.83% and 87.06% ownership share respectively for Mayo and Roxboro.

1 four power blocks. The Lee Energy Complex CC power block ("Lee CC") has a
2 configuration of three CTs and one steam turbine. The two Richmond County
3 power blocks located at the Smith Energy Complex consist of two CTs and one
4 steam turbine each. The most recent CC addition began commercial operation on
5 November 27, 2013 at Sutton Energy Complex ("Sutton CC") in Wilmington, North
6 Carolina and consists of two CTs and one steam turbine. Within these CC power
7 blocks, all nine CTs are equipped with low NO_x burners, SCR equipment, and
8 carbon monoxide volatile organic compound catalysts. The steam turbines do not
9 combust fuel and, therefore, do not require NO_x controls. The Company's hydro
10 fleet consists of 15 units providing approximately 222 MWs of capacity.

11 **Q. WHAT CHANGES HAVE OCCURRED WITHIN THE FOSSIL/HYDRO**
12 **PORTFOLIO SINCE DEP'S 2013 ANNUAL FUEL PROCEEDING?**

13 A. Changes within the portfolio include the addition of 622 MWs of capacity at Sutton
14 CC. Also within the review period, DEP retired Sutton coal-fired Units 1, 2, and 3.
15 These retirements in November 2013 reduced capacity by 553 MWs³, retiring units
16 that began commercial operation between 1954 and 1972. The CT fleet was reduced
17 by a total of 261 MWs with the March 2013 retirement of the remaining units at
18 Cape Fear and Robinson Stations that began commercial operation between 1968
19 and 1969.

20 **Q. ARE OTHER CAPACITY CHANGES POSSIBLE WITHIN DEP'S**
21 **FOSSIL/HYDRO PORTFOLIO IN THE NEXT FEW YEARS?**

22 A. Yes. In February 2014, DEP announced that it has entered discussions with North
23 Carolina Eastern Municipal Power Agency ("NCEMPA") regarding the potential

³ Summer capacity ratings as noted in 2013 DEP Integrated Resource Plan.

1 purchase of NCEMPA's portions of Roxboro Unit 4 and Mayo Unit 1. This
2 purchase, if completed, would bring DEP's ownership to 100% and add 208 MWs to
3 DEP's coal-fired portfolio.

4 **Q. WHAT ARE DEP'S OBJECTIVES IN THE OPERATION OF ITS**
5 **FOSSIL/HYDRO FACILITIES?**

6 A. The primary objective of DEP's fossil/hydro generation department is to safely
7 provide reliable and cost-effective electricity to DEP's Carolinas customers. The
8 Company achieves this objective by focusing on a number of key areas. Operations
9 personnel and other station employees are well-trained and execute their
10 responsibilities to the highest standards in accordance with procedures, guidelines,
11 and a standard operating model. Like safety, environmental compliance is a "first
12 principle" and DEP works very hard to achieve high level results.

13 The Company achieves compliance with all applicable environmental
14 regulations and maintains station equipment and systems in a cost-effective manner
15 to ensure reliability. The Company also takes action in a timely manner to
16 implement work plans and projects that enhance the safety and performance of
17 systems, equipment, and personnel, consistent with providing low-cost power
18 options for DEP's customers. Equipment inspection and maintenance outages are
19 generally scheduled during the spring and fall months when electricity demand is
20 reduced due to weather conditions. These outages are well-planned and executed
21 with the primary purpose of preparing the unit for reliable operation until the next
22 planned outage.

1 **Q. HOW MUCH GENERATION DID EACH TYPE OF GENERATING**
2 **FACILITY PROVIDE FOR THE REVIEW PERIOD?**

3 A. For the review period, DEP's total system generation was 61,538,758 MW hours
4 ("MWHs"), of which 34,637,477 MWHs, or approximately 57%, was provided by
5 the fossil/hydro fleet. The breakdown includes a 28% contribution from coal-fired
6 stations, an approximately 27% contribution from gas facilities, and an
7 approximately 2% contribution from hydro facilities.

8 The Company's portfolio includes a diverse mix of units that, along with
9 additional nuclear capacity, allow DEP to meet the dynamics of customer load
10 requirements in a logical and cost-effective manner. Additionally, DEP has utilized
11 the Joint Dispatch Agreement ("JDA"), described further in Company witness
12 Weintraub's testimony, which allows generating resources for DEP and DEC to be
13 dispatched as a single system to enhance dispatching at the lowest possible cost.
14 The cost and operational characteristics of each unit generally determine the type of
15 customer load situation (e.g., base and peak load requirements) that a unit would be
16 called upon or dispatched to support.

17 **Q. HOW DID DEP COST EFFECTIVELY DISPATCH THE DIVERSE MIX OF**
18 **GENERATING UNITS DURING THE REVIEW PERIOD?**

19 A. The Company, like other utilities across the U.S., has experienced a change in the
20 dispatch order for each type of generating facility due to favorable economics
21 resulting from the low pricing of natural gas which includes the expansion of shale
22 gas as described in Company witness Weintraub's testimony. Further, the addition
23 of new combined cycle units within DEP's portfolio in recent years has provided

1 DEP with additional natural gas resources that feature state-of-the-art technology for
2 increased efficiency, fuel flexibility, and significantly reduced emissions. These
3 factors promote the use of natural gas and provide real benefits in both pricing and
4 reduced emissions for customers.

5 **Q. WHAT WAS THE HEAT RATE FOR DEP'S COAL-FIRED FLEET**
6 **DURING THE REVIEW PERIOD?**

7 A. Heat rate is a measure of the amount of thermal energy needed to generate a given
8 amount of electric energy and is expressed as British thermal units ("Btu") per
9 kilowatt-hour ("kWh"). A low heat rate indicates an efficient fleet that uses less heat
10 energy from fuel to generate electrical energy. Over the review period, the average
11 heat rate for the most active coal-fired units – excluding those retired during the
12 review period – was 11,098 Btu/kWh. The most active station during this period
13 was Roxboro, providing 68% of the coal production with an average of heat rate of
14 10,662 Btu/kWh.

15 **Q. PLEASE DISCUSS THE OPERATIONAL RESULTS FOR DEP'S**
16 **FOSSIL/HYDRO FLEET DURING THE REVIEW PERIOD.**

17 A. The Company's generating units operated efficiently and reliably during the test
18 period. Several key measures are used to evaluate the operational performance
19 depending on the generator type: (1) equivalent availability factor ("EAF"), which
20 refers to the percent of a given time period a facility was available to operate at full
21 power, if needed (EAF is not affected by the manner in which the unit is dispatched
22 or by the system demands; it is impacted, however, by planned and unplanned
23 maintenance (*i.e.*, forced) outage time); (2) net capacity factor ("NCF"), which

measures the generation that a facility actually produces against the amount of generation that theoretically could be produced in a given time period, based upon its maximum dependable capacity (NCF is affected by the dispatch of the unit to serve customer needs); (3) equivalent forced outage rate (“EFOR”), which represents the percentage of unit failure (unplanned outage hours and equivalent unplanned derated⁴ hours); a low EFOR represents fewer unplanned outage and derated hours, which equates to a higher reliability measure; and, (4) starting reliability (“SR”), which represents the percentage of successful starts.

The following chart provides operation results categorized by generator type, as well as results from the most recently published North American Electric Reliability Council (“NERC”) Generating Unit Statistical Brochure (“NERC Brochure”) representing the period 2008 through 2012.

Generator Type	Measure	Review Period	2008-2012	Nbr of Units
		Operational Results	NERC Average	
Coal-fired Review Period	EAF	86.2%	81.6%	458
	NCF	39.8%	61.5%	
	EFOR	3.4%	8.4%	
Coal-fired Summer Peak	EAF	95.5%	n/a	n/a
Total CC Average	EAF	92.5 %	85.6%	301
	NCF	67.1%	45.2%	
	EFOR	0.7%	6.39%	
Total CT Average	EAF	90.9%	62.8%	939
	SR	98.2%	97.6%	
Hydro	EAF	94.8%	84.6%	1103

⁴ Derated hours are hours the unit operation was less than full capacity.

1 The NERC performance metrics and number of units shown in the chart for
2 the coal-fired units represent an average of comparable units based on capacity
3 rating.

4 **Q. PLEASE DISCUSS SIGNIFICANT OUTAGES OCCURRING AT DEP'S**
5 **FOSSIL/HYDRO FACILITIES DURING THE REVIEW PERIOD.**

6 A. In general, planned maintenance outages for all fossil and hydro units are scheduled
7 for the spring and fall to maximize unit availability during periods of peak demand.
8 Most of these units had at least one small planned outage during this review period
9 to inspect and maintain plant equipment. For the review period, the most significant
10 outages occurred in the spring of 2013. Mayo Unit 1 entered a planned maintenance
11 outage to implement several major projects during which the more significant
12 projects completed included a dry bottom ash conversion, the replacement of 40 coal
13 pipe burners with new low NO_x burners, the replacement of discharge electrodes on
14 the electrostatic precipitator ("ESP") for improved performance, and the conversion
15 of the air heater baskets to a newer design, which is more resistant to plugging.

16 Also in the spring, Asheville Unit 1 entered a planned maintenance outage
17 which involved major inspections on the turbine, generator, and balance of plant
18 systems along with maintenance on the boiler. The more significant projects
19 completed were rewind of the generator stator and field, replacement of the
20 economizer section of the boiler, and air heater basket replacement. Roxboro station
21 had planned maintenance outages on Unit 3 in the spring and Unit 4 in the fall. The
22 Roxboro Unit 3 outage included maintenance work for the boiler, turbine, and
23 scrubber. The more significant projects completed were replacement of condenser

1 tubes, replacement of SCR catalyst for enhanced NO_x control, and hot reheat elbow
2 replacements. The fall Roxboro Unit 4 outage was a planned turbine and scrubber
3 maintenance outage. The more significant projects completed were rebundling of
4 the condenser tubes, restoration of the turbine valves, and repairs to the ESP.

5 Significant outages for the CT fleet included returning Darlington Unit 12 to
6 service in June 2013 following a complete restoration effort. The Company took the
7 opportunity to incorporate upgrades including improved blade path thermocouples
8 and generator controls, modified exhaust bearing tunnels, and installed new
9 instrumentation to provide improved information and control for operators. A
10 planned spring outage for a major turbine overhaul at Darlington Unit 13 required an
11 extension due to the need to address rotor damage which occurred during installation
12 transfer. The vendor completed a full examination and made needed repairs.

13 There were also planned outages for turbine inspections at Richmond CC
14 and Lee CC facilities, which included maintenance activities to ensure reliability of
15 the power blocks. Within the hydro fleet, DEP addressed end of life concerns with
16 generator rewinds for Blewett Units 2 and 5, and Tillery Units 2 and 3.

17 **Q. HOW DOES DEP ENSURE EMISSIONS REDUCTIONS FOR**
18 **ENVIRONMENTAL COMPLIANCE?**

19 A. As noted above, DEP has installed pollution control equipment on coal-fired units,
20 as well as new generation resources in order to meet various current federal, state,
21 and local reduction requirements for NO_x and SO₂ emissions. The SCR technology
22 that DEP currently operates on the coal-fired units uses ammonia or urea for NO_x
23 removal and the scrubber technology employed uses crushed limestone for SO₂

1 removal. SCR equipment is also an integral part of the design of the newer CC
2 facilities in which aqueous ammonia (19% solution of NH_3) is introduced for NO_x
3 removal.

4 Overall, the type and quantity of chemicals used to reduce emissions at the
5 plants varies depending on the generation output of the unit, the chemical
6 constituents in the fuel burned, and/or the level of emissions reduction required. The
7 Company is managing the impacts, favorable or unfavorable, as a result of changes
8 to the fuel mix and/or changes in coal burn due to competing fuels and utilization of
9 non-traditional coals. The goal is to effectively comply with emissions regulations
10 and provide the most efficient total-cost solution for operation of the unit. The
11 Company will continue to leverage new technologies and chemicals to meet both
12 present and future state and federal emission requirements including the upcoming
13 Mercury and Air Toxics Standards rule. Company witness McGee provides the cost
14 information for DEP's chemical use and forecast.

15 **Q. DOES THAT CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

16 **A.** Yes, it does.